

1 SUPERIOR COURT OF THE STATE OF CALIFORNIA
2 FOR THE COUNTY OF LOS ANGELES

3 DEPARTMENT NO. 57

HON. PAUL G. BRECKENRIDGE, JR., JUDGE

4
5 CHURCH OF SCIENTOLOGY OF CALIFORNIA,)

6 Plaintiff,)

7 vs.)

No. C 420153

8 GERALD ARMSTRONG,)

9 Defendant.)

10 MARY SUE HUBBARD,)

11 Intervenor.)
12

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15 REPORTERS' TRANSCRIPT OF PROCEEDINGS

16 Thursday, May 10, 1984

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19 APPEARANCES:

20 (See Appearances Page)

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25
26 VOLUME 9

27 Pages 1389 - 1563

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Official Reporters

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E X H I B I T S

<u>DEFENDANT'S</u>	<u>IDENTIFIED</u>	<u>RECEIVED</u>
N - Publication PRO News	1393	
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1 LOS ANGELES, CALIFORNIA; THURSDAY, MAY 10, 1984; 9:07 A.M.

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4 THE COURT: Very well, in the case on trial let
5 the record reflect that counsel and all parties are present.

6 Mr. Flynn, you may proceed.

7 MR. FLYNN: Thank you, Your Honor.

8 Mr. Gerald Armstrong, please.

9 Your Honor, I take it the practice out here
10 is counsel can sit during examination of the witnesses.

11 THE COURT: Yes, you may sit if you desire to.

12 MR. FLYNN: In Massachussetts that would be a real
13 no-no.

14
15 GERALD ARMSTRONG,

16 the defendant herein, called as a witness in his own behalf,
17 was sworn and testified as follows:

18 THE COURT: Please state your name for the record, sir.

19 THE WITNESS: Gerald Armstrong.
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DIRECT EXAMINATION

2 BY MR. FLYNN:

3 Q Where do you live, Mr. Armstrong?

4 A Costa Mesa, California.

5 Q How long have you lived there?

6 A About two years and four months.

7 Q Are you a resident of California?

8 A Yes.

9 Q And are you currently employed?

10 A No,

11 Q What was your last employment?

12 A It was at a law firm.

13 Q What was the name of the firm?

14 A Feldsott, Lee and Van Gemert.

15 Q What was the nature of your duties at that
16 firm?

17 A I was a paralegal for the most part in the
18 accounting department.

19 Q How long did you work for that firm?

20 A For two years.

21 Q And why did you leave?

22 MR. LITT: I object. Is that relevant to this case?

23 THE COURT: It may be. I don't know.

24 Overruled. You may answer.

25 THE WITNESS: I left because this trial was coming
26 up and I had to prepare for the trial and be here during
27 this trial.

28 Q What was the date that you left?

1 A March 2nd.

2 Q Now, where were you born and brought up,
3 Mr. Armstrong?

4 A In Chilowac, British Columbia, Canada.

5 Q Did you go to high school in British Columbia?

6 A Yes.

7 Q And at the high school did you learn about a
8 franchise of a Scientology organization?

9 A Yes.

10 MR. LITT: Objection. Leading.

11 THE COURT: It is a preliminary question.

12 Overruled.

13 Q BY MR. FLYNN: Where was that, Mr. Armstrong?

14 A The franchise was in Vancouver.

15 Q What was it called?

16 A Scientology Little Mountain.

17 Q Was it called a church, or a franchise?

18 A It was a franchise.

19 Q Did you become involved with any activities
20 relating to that franchise of Scientology?

21 A Yes.

22 Q What activities were those?

23 A In the summer of 1969 I attended some lectures.
24 And in September of 1969 I began some courses in Scientology.

25 Q Now, in connection with the commencement of
26 those courses, did you read any materials that were distributed
27 by the Scientology franchise?

28 A During that period or prior to me actually

1 beginning courses, I read a number of publications, both
2 magazines and books.

3 Q And at some point did you join a group called
4 the Sea Organization?

5 A Yes.

6 Q And when did you join the Sea Organization?

7 A Beginning of 1971.

8 Q And between the time that you became involved
9 in the activities of the franchise and the time you joined
10 the Sea Organization, do you recall any of the publications
11 that you read that were disseminated by Scientology Organizations?

12 A Yes.

13 Q And what do you recall?

14 A Are you referring to the Sea Org ones, or just
15 any?

16 Q Did you read certain publications that induced
17 you to become involved with Scientology organizations?

3-1

1 MR. LITT: Objection. The question is leading. Also,
2 what period of time are we talking about? Are we talking
3 about 1971? Are we talking about 1969?

4 MR. FLYNN: I will withdraw it, Your Honor.

5 THE COURT: All right, you can reframe it.

6 Q BY MR. FLYNN: Between 1969 and the time you
7 joined the Sea Organization did you read various publications
8 disseminated by Scientology organizations that you relied
9 upon in connection with your joining the Sea Organization?

10 A Yes.

11 Q Let me show you this publication.

12 THE COURT: You want to show it to counsel, first?

13 MR. FLYNN: I have a copy for the court.

14 THE COURT: All right. What is your next in order?

15 THE CLERK: N.

16 THE COURT: All right, mark it N for identification.

17 Q BY MR. FLYNN: Do you recognize that document,
18 Mr. Armstrong?

19 A Yes.

20 Q Exhibit N?

21 A Yes.

22 Q And what is it?

23 A It is a publication put out by -- it is called
24 PRO News, and it was a newsletter which was distributed
25 within Scientology during that period. I don't know if it
26 still is. It may be discontinued, but it was in the early
27 days.

28 Q Now, were there any representations in Exhibit N

1 that you relied upon in connection with your joining the
2 Sea Organization?

3 MR. LITT: Objection, Your Honor. The question as
4 framed is leading. Also, there is no foundation as to even
5 what is being referred to.

6 Let us get where we are in this document.
7 The way of framing these questions, "as relied upon"; one,
8 we contend that this is completely irrelevant. What has
9 that to do with what happened in 1982, what Mr. Armstrong
10 read in 1969?

11 THE COURT: We don't need a speech, Counsel. I know
12 what you are saying. I think the question is very simple.

13 It is probably compound and a little bit
14 leading. Why don't you just ask simple questions, Mr. Flynn,
15 and we will get along with this witness.

16 Counsel is entitled to develop his case as he
17 sees fit and he will be permitted to do so. Let's try to
18 make them simple questions, though.

19 Q BY MR. FLYNN: What representations, if any,
20 did you rely upon that are contained in exhibit N,
21 Mr. Armstrong?

22 A Well, there is a great number of them here.
23 I heard of the Sea Organization within, I don't know, the
24 first short while of becoming involved with Scientology,
25 and I understood from all written and from verbal communications
26 that it was the elite of Scientology. It was the organization
27 which was bringing to the world, and the head of the Sea
28 Organization was L. Ron Hubbard.

1 MR. HARRIS: May the witness' answer be stricken as
2 non-responsive to the question, Your Honor?

3 THE COURT: I will let it stand.

4 THE WITNESS: And the information in here on L. Ron
5 Hubbard was a great deal of reason which motivated me to
6 become further involved and ultimately to join the Sea
7 Organization, and it was some of the things which were
8 offered here which I felt were attainable or which were
9 promised, and my being more involved offered a greater
10 possibility for me to attain these things, and those things--
11 some of them are mentioned here, but more particularly, the
12 representations about L. Ron Hubbard, I think, were the
13 most significant factor in my joining the Sea Organization,
14 which was promoted to me as working for him, working with
15 Ron, working for Ron.

16 I saw here that here was a man of remarkable
17 achievements, and I knew that I didn't have particularly
18 remarkable achievements and I felt like I could contribute
19 to what this man was apparently doing and that I could gain
20 those things which were promised in here.

21 Q BY MR. FLYNN: Now, can you identify specific
22 representations that were made in exhibit N that you relied
23 upon?

24 A Regarding myself and one of the things which
25 was promised was that the intelligence quotient of a person
26 could be raised about one point per hour or processing,
27 a thing which was considered impossible a few years ago
28 and that was something which had a great deal of significance

1 to me, perhaps because of how I viewed myself at the time.
2 But it was very significant and that was something which I
3 expected throughout the course of my auditing or processing,
4 I guess it is called here, in Scientology.

5 Q With regard to representations about L. Ron
6 Hubbard, can you identify specific representations in
7 exhibit N that you relied upon?

8 MR. LITT: Your Honor, I just want to make clear at
9 this point since we have gotten into it, the questions being
10 asked, in particular Mr. Armstrong's last answer, but this
11 whole line of questioning, we just want to repeat our
12 position on the First Amendment, they are going directly
13 into representations surrounding the joining of a religion
14 and somehow trying to make that a basis of his defense.

4-1
1 We want to make clear that we think this whole
2 thing is barred. I won't stand up each time and say it,
3 but this is the first time it had come up in testimony. So
4 I wanted to make clear our position. This is not permissible
5 under the First Amendment.

6 THE COURT: Very well.

7 Q BY MR. FLYNN: Do you recall the question,
8 Mr. Armstrong. I could --

9 Do you wish me to read from this, or just to
10 answer from off the top of my head?

11 Q If you could refer to the page and the
12 representation on exhibit N that you relied upon when you
13 joined.

14 A Okay. Here I am reading from the back part
15 of exhibit N. It is called "A brief biography of L. Ron
16 Hubbard." And its pages, I believe, are numbered.

17 I put a great deal of reliance on the
18 representation that L. Ron Hubbard spent several years and
19 traveled around Asia; that he had been in China and India
20 and studied with Llama priests; that is on page 1.

21 That he was a nuclear physicist; although I
22 don't see that in here. It was just that he was a member
23 of the first U.S. course in formal education of what is
24 called today nuclear physics.

25 That he excelled in his subjects.

26 That he headed expeditions to study savage
27 peoples; the fact that he was a member of the Explorers'
28 Club; that he had done considerable movie work. And all of

1 the war service that this could be sort of capsulized with
2 the fact that he was a hero.

3 I had seen these and other biographical
4 sketches by this time in which he was represented as a
5 commander of a squadron of Corvettes; that he had been
6 wounded in action, blinded.

7 I relied greatly on the claims from that
8 period that Dianetics and Scientology were sciences.

9 And the next section here, "A science is born"
10 on page 4, there is a statement by L. Ron Hubbard, "It was
11 inevitable that a man who spent his youth in Asia and who
12 studied at the mathematics and physical science of the West
13 would become interested in the mind and any such man combining
14 what he knew would probably have discovered Dianetics and
15 Scientology."

16 Further down, he says, "Scientology is an
17 organized body of scientific research, knowledge concerning
18 life, life sources and the mind and includes practices that
19 improve the intelligence, state and conduct of persons."

20 These were things which I relied upon, the
21 claim that it was a science and was demonstrably true and
22 especially that L. Ron Hubbard had, apparently, spent a
23 great deal of time studying in Asia, studying the wisdom of
24 the Far East and combining it with his knowledge of mathematics
25 and sciences.

26 Q Did you rely on any aspect of Mr. Hubbard's
27 educational background?

28 A Yes. I think I have mentioned something about

1 that. His claim that he was an atomic physicist; that he
2 had graduated from George Washington University; that he was
3 an engineer.

4 Q And during that period of time did you also
5 read several books written by L. Ron Hubbard?

6 A Yes.

7 Q Let me show you these two books.

8 May they be marked as exhibits O and P
9 respectively, Your Honor?

10 THE COURT: Identify which is O and which is P.

11 MR. FLYNN: "Dianetics, the Original Thesis".

12 "All About Radiation by a Nuclear Physicist
13 and a Medical Doctor" is exhibit P.

14 Q Between 1969 and the time you joined the
15 Sea Organization, did you read those books, Mr. Armstrong?

16 A Yes.

17 Q And what, if any, representations about
18 Mr. Hubbard that were made in those books did you rely upon?

19 A Do you wish me to look at the books?

20 Q Can you recall any without looking at the books?

21 A Well, I think during that period of time each
22 one of the books had either about the author sections or dust
23 jacket material which contained a fairly standard story about
24 Mr. Hubbard.

25 The thing which stuck in my mind through
26 many years was his claim to have been crippled and blinded
27 during the war and that he cured the injuries and the
28 blindness using what he knew of the mind and that this was

1 the precursor of Dianetics.

2 This was -- to me at the time this is what it
3 was all about. This was the thing it could do.

4 He claimed to have twice been pronounced dead.
5 It was a matter of medical record that he was twice pronounced
6 dead.

7 Again, the war career came up. He claimed to
8 have been a commander of a Corvette squadron, been extensively
9 decorated; saw service in several theaters of war; was
10 obviously in combat. The claims of having studied in the
11 Far East, having studied under Llamas and having combined the
12 wisdom of the Far East with the knowledge of nuclear physics.
13 Most of them claimed that he was a graduate of George
14 Washington University.

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1 Q And in the --

2 MR. HARRIS: Excuse me, Your Honor. Just so I can
3 get this straight.

4 Is the witness now stating that these are
5 things that he read between 1969 and 1971 when he joined the
6 Sea Organization or is he encapsulating what is in exhibits?

7 THE COURT: Well you can clarify that, Counsel.

8 Q BY MR. FLYNN: Well, what you have just
9 testified to, Mr. Armstrong, is that a summary of what is in
10 exhibits N, O and P?

11 A Yes.

12 Q And in exhibit P, "Dianetics the Original
13 Thesis" does it state that he graduated from Columbian College,
14 part of George Washington University?

15 MR. HARRIS: Objection; leading and suggestive.

16 THE COURT: That is not particularly. Overruled. He
17 asked whether it so states.

18 MR. HARRIS: May the record reflect the witness is
19 reading the book?

20 THE COURT: Well he is looking at it. I don't know
21 if he is reading the entire book, but he is looking at a
22 page, appears to be looking at it or was.

23 Q BY MR. FLYNN: What page in exhibit P contains
24 biographical background of L. Ron Hubbard, Mr. Armstrong?

25 A 158 and 169.

26 Q And did you read that prior to joining the
27 Sea Organization?

28 A Yes.

1 Q And are there any representations in there
2 about Mr. Hubbard's biographical background that you relied
3 upon?

4 A Yes.

5 Q And would you read them, please?

6 A (Reading):

7 "Much of Hubbard's early youth was spent
8 in the American West and he traveled extensively
9 in Asia, as a young man. He studied sciences
10 and mathematics at George Washington University,
11 graduating from Columbian College. He attended
12 Princeton University and obtained a degree as
13 Doctor of Philosophy, Ph.d. from Sequoia University."

14 Q If I can stop you there, is it your understanding
15 that Columbian College is a college of engineering and
16 mathematics at George Washington University?

17 A My understanding is that it is at least the --

18 MR. LITT: Objection as to what his current under-
19 standing is. Was this his understanding in 1969 to 1971
20 when he read it and relied on it.

21 THE COURT: Well, I suppose if he knows what it is,
22 it may be a fact which is something that can be testified
23 to as distinguished from what he was relying upon at that
24 time, so I will overrule the objection.

25 THE WITNESS: My understanding was that he graduated
26 from George Washington University, of which Columbian
27 College was a part.

28 Q BY MR. FLYNN: And when you read exhibit O, did

1 you understand that Mr. Hubbard was a nuclear physicist and
2 a medical doctor?

3 MR. LITT: Objection; leading.

4 MR. FLYNN: Withdraw it, Your Honor.

5 Q What if any understanding did you have with
6 regard to Mr. Hubbard's biographical background when you
7 read exhibit O. Mr. Armstrong?

8 A That he was a nuclear physicist.

9 Q And let me show you a document entitled
10 "My Philosophy" by L. Ron Hubbard.

11 May this be marked, Your Honor, as exhibit Q?

12 THE COURT: So marked as Q.

13 Q BY MR. FLYNN: Did you receive that before
14 joining the Sea Organization?

15 A Yes.

16 Q What, if any, representations did you rely
17 upon about Mr. Hubbard's background in that document,
18 exhibit Q?

19 MR. HARRIS: In joining the Sea Org? Is that the
20 reference, Your Honor?

21 MR. FLYNN: In joining the Sea Organization.

22 THE COURT: All right.

23 THE WITNESS: Again here is the claim of having
24 wandered through Asia; that he had been through a terrible
25 war and suffered terror and pain un eased by a single word
26 of decency or humanity.

27 But he had been blinded with injured optic nerves
28 and lame with physical injuries to hip and back at the end

1 of World War II; that he faced an almost nonexistent future;
2 that his service record stated, "This officer has no neurotic
3 or psychotic tendencies of any nature whatsoever." That it
4 also stated "permanently disabled physically."

5 That he was abandoned by family and friends
6 as a supposedly hopeless cripple and probable burden upon
7 them for the rest of his days; that he yet worked his way
8 back to fitness and strength in less than two years, using
9 only what he knew and could determine about man and his
10 relationship to the university.

11 That he had no one to help him and that he was
12 studying when he couldn't see.

13 Q And did you believe all those representations
14 at the time?

15 A Yes.

16 Q Let me show you several other publications.
17 Do you recognize a book called "Successes of
18 Scientology," Mr. Armstrong?

19 A Yes.

20 Q And did you read that before joining the Sea
21 Organization?

22 A Yes.

23 MR. LITT: If I can -- it is the page that contains
24 longhand?

25 MR. FLYNN: Correct, with a picture of Mr. Hubbard,
26 and may this be marked, Your Honor, as next in order?

27 THE COURT: Okay.

28 Q BY MR. FLYNN: And did you rely on representations

1 in there about Mr. Hubbard and his background under his
2 picture?

3 A Yes.

4 Q And were those similar representations as to
5 what you have already testified about?

6 A Yes, I believe this is a duplication of one
7 of these that I read.

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1 Q And with regard to this biographical sketch
2 that you now have in front of you, Mr. Armstrong, do you
3 recognize that?

4 A Yes.

5 Q And it bears the caption at the top "L. Ron
6 Hubbard"; is that correct?

7 A Yes.

8 MR. FLYNN: May that be marked next in order, Your Honor?

9 THE COURT: Exhibit S.

10 Q BY MR. FLYNN: Did you read that before
11 joining the Sea Organization?

12 A Yes.

13 Q And were similar representations made by
14 Mr. Hubbard in that document?

15 A Yes.

16 Q Did you rely on those?

17 A Yes.

18 Q And with regard to a document entitled "Advance 7,"
19 did you see that before joining the Sea Organization?

20 A Yes.

21 MR. FLYNN: May that be marked as exhibit next
22 in order, Your Honor, entitled "Operation Earth"?

23 THE COURT: That will be exhibit T.

24 MR. LITT: Could we have the names of the
25 publications that R, S and T are from?

26 THE COURT: Give us that again, Mr. Flynn.

27 MR. FLYNN: T is from a publication entitled "Advance 7."

28 THE COURT: Is there a date on it?

1 MR. FLYNN: I believe it is 19 January, 1970 on the
2 back page.

3 MR. HARRIS: And the church or mission that published
4 it?

5 MR. FLYNN: Advance Organization, Los Angeles.

6 "Successes of Scientology" is copyrighted 1968
7 by L. Ron Hubbard; published by Publications Organization
8 Worldwide.

9 MR. LITT: Exhibit S?

10 MR. FLYNN: Exhibit S, Your Honor, is the one-page
11 biographical sketch of L. Ron Hubbard.

12 THE COURT: Yes.

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T7

1 Q It is from a magazine entitled "Scientology
2 The Field Staff Member Magazine" copyright 1968 by
3 L. Ron Hubbard.

4 THE COURT: You are losing us rapidly, Counsel, the
5 way you are doing this.

6 MR. FLYNN: The page, Your Honor, that is from this
7 book is a page that bears at the top "L. Ron Hubbard" in
8 large --

9 THE COURT: That is exhibit S?

10 MR. FLYNN: Exhibit S.

11 THE COURT: You want the whole book marked S; is that
12 correct?

13 MR. FLYNN: Correct, Your Honor.

14 MR. HARRIS: Do you have a copy of the whole booklet
15 for counsel?

16 MR. FLYNN: I don't. What we are primarily relying
17 upon is that page, Your Honor, but it comes from the book.

18 THE COURT: Okay.

19 Henceforth, I don't know whether you have any
20 more publications, but let's mark the publication and then
21 sub-mark the pages T-1 or T-2 or something like that.

22 MR. FLYNN: That is fine, Your Honor.

23 That is all I have for now.

24 THE COURT: Okay.

25 Q BY MR. FLYNN: What is on exhibit T?

26 THE COURT: Haven't got to T yet.

27 MR. FLYNN: That is that "Operation Earth."

28 THE COURT: Okay, "Operation Earth."

1 MR. FLYNN: From "Advance 7."

2 THE COURT: Let's mark the book as T and this particular
3 page as T-1.

4 MR. FLYNN: So then "Advance 7" is T and the page will
5 be T-1.

6 THE COURT: "Advance 7" is some new system of
7 numbering.

8 Q BY MR. FLYNN: Now, what in connection with
9 the publication that appears at the top "Operation Earth"
10 did you reply upon, Mr. Armstrong?

11 A Statement here about the Sea Organization, that
12 the Sea Organization was formed to compose a superiorly
13 disciplined, elite group, working directly under Ron to aid
14 the creation of a new civilization on this planet.

15 Q Now, in connection with those publications,
16 in all of the publications you read before joining the Sea
17 Organization, can you summarize the representations about
18 L. Ron Hubbard that you relied upon in joining the Sea
19 Organization?

20 A First of all that he was the head of the Sea
21 Organization and that I would be working for him. That he was
22 a hero, an explorer, a scientist, a nuclear physicist, a
23 mathematician. He was an engineer.

24 That he had studied for a great period of time
25 in Asia and India and China, Mongolia, and that he had combined
26 the wisdom that he learned first hand in the East with the
27 scientific training in Western Universities, and the result
28 was the science of Scientology, and the Sea Org were the elite

1 of Scientology who were working directly with him to create
2 a civilization out of barbarism, which is earth.

3 THE COURT: How old were you at this time?

4 THE WITNESS: Twenty-three.

5 Q BY MR. FLYNN: And what was your educational
6 background at that point, Mr. Armstrong?

7 A Well, I had attended high school. I never
8 graduated from high school.

9 I had taken a half a year of university at
10 the University of British Columbia and had dropped out at
11 that time.

12 Q And did you believe that Mr. Hubbard was a
13 highly educated man?

14 A Yes.

15 Q And did you believe that he was a war hero
16 during World War II?

17 A Yes.

18 Q And did you believe that he was a nuclear
19 physicist?

20 A Yes.

21 Q Now would you describe what happened in the
22 circumstances under which you joined this organization called
23 the Sea Organization?

24 A As a result of everything that I had read and
25 attending some lectures given by Sea Org recruiting personnel
26 up in Vancouver, I flew down to Los Angeles. I sold everything
27 I had and put together enough money to go down to Los Angeles,
28 and I signed at that time a billion year contract and

1 within a few days of that I went on board -- it was called
2 a station ship at that time, a little, former military
3 vessel called the Bollivar which was in Long Beach Harbor,
4 and I was on board the Bollivar for seven days, and then I
5 was flown to Madrid, Spain, and then I was put on a train
6 down to Algeciras and across from Algeciras, Spain to Tangiers,
7 Morocco where the Apollo, which was the flagship of the
8 Sea Organization, was docked at that time, and I went on
9 board the Apollo and I was on board for the next four years
10 or more.

11 Q Now when these lectures were given by a Sea Org
12 recruiter, what was the nature of those lectures?

13 MR. HARRIS: The nature of the lecture is vague. If
14 it is to be a conversation or a lecture, who was present,
15 who was the speaker, et cetera.

16 THE COURT: I don't think that is necessary. I
17 think you can describe generally what it is all about. We
18 don't have to have the speech in its entirety, but you can
19 describe generally what it was all about.

20 THE WITNESS: Well, someone from the Sea Organization,
21 a Sea Org officer or someone involved with recruiting for the
22 Sea Organization came occasionally to the outer franchises
23 and talked to people who would be assembled to listen to the
24 talk, and it had to do with what the Sea Organization was
25 doing, what Ron was doing, what the Sea Organization offered
26 to anyone who joined it, and that was principally what it
27 was.

28 Q BY MR. FLYNN: And were representations made

1 about Mr. Hubbard during those lectures?

2 A Well, always there was talk of him and the fact
3 that we would be, the Sea Organization worked directly for
4 him, and always there was the talk of how great he was and
5 that sort of thing.

6 I don't recall specific representations at that
7 time that people read from the biographical sketches at that
8 time. That occurred on a regular basis later, but not at
9 that time.

10 Q Now were there representations made about
11 Mr. Hubbard's honesty, integrity and moral character?

12 MR. LITT: In the lecture given by this unnamed Sea Org
13 person?

14 MR. FLYNN: I will withdraw it.

15 Q Prior to you joining the Sea Organization,
16 were there representations disseminated about Mr. Hubbard by
17 Scientology organizations about Mr. Hubbard's honesty,
18 integrity and moral character?

19 A I believe so. The subject of honesty and truth
20 permeated virtually everything that he wrote. It was the
21 major factor which got me into Scientology with the promise
22 of truth and the promise of honesty, and it was in all of
23 his materials.

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1 Q In fact --

2 A Never could one glean from the material that it
3 was dishonesty which was looked up to by either him or the
4 organization.

5 Q Would you turn to the back page of exhibit N,
6 the long biographical sketch "PRO News"?

7 Is there a reference on the bottom of that in
8 large type, Mr. Armstrong?

9 A Yes.

10 Q And is that under the picture of L. Ron Hubbard?

11 A Yes.

12 Q And under his name?

13 A Yes.

14 Q And what does that say?

15 A "Truth is the exact time, place, form and event.
16 Axiom 38. LRH."

17 Q And did you understand truth to be the
18 underlying basis of all of the Scientology principles?

19 A Yes.

20 Q And that it was Mr. Hubbard that that principle
21 emanated from? Did you understand that?

22 A Yes.

23 Q And was that one of the primary bases for your
24 joining the SEA Organization?

25 MR. LITT: Objection. Leading.

26 THE COURT: Well, he has already testified to that.
27 I'll sustain the objection.

28 Q BY MR. FLYNN: When you arrived on board the

1 ship in Morroco, would you describe what duties you were
2 assigned to.

3 A Initially, over the first couple of days, I did
4 introductory packs, introductory briefing packs which
5 everyone who came on board had to do.

6 Thereafter I worked for a brief time in the
7 Galley unit of the ship as a storesman. And I was connected
8 with the Galley, washing dishes, that sort of thing, for
9 probably a couple of weeks.

10 Then I became the -- I joined what is called the
11 Deck Project Force. And I learned deck skills. And I
12 principally was painting and chipping the ship for another
13 couple of weeks.

14 Then I became the boat and transport in charge.
15 And during that time I had under me all the ship's life
16 boats, some sleds, motor boats and the vehicles which were
17 on board the ship which we disembarked -- when we came into
18 port, we took them off the ship and the people who had
19 business in port used them. So there was a number of
20 Mopeds. And I was responsible for those.

21 Sometime in mid-April --

22 Q This is what year, now?

23 A 1971.

24 Sometime in mid-April we took off the ship
25 Hubbard's cars because we were taking them to a villa which
26 he had in Tangier at that time. So we took them off the
27 ship. And one of them was a small Fiat car. And he ordered
28 that I be driver of that car.

1 So for the next eight or ten months, I guess,
2 until approximately February of '72, I just drove the car.
3 That became my job. And I drove people around who had
4 business in the ports where we visited.

5 So we took the car off the ship whenever we came
6 into port and I drove it for transporting goods and people
7 and put the car back on when we sailed.

8 Q Now, between the time you joined the ship in
9 Morroco and up to the time you completed your duties as a
10 car driver, did you participate in any religious activities?
11 Just yes or no.

12 MR. LITT: Objection.

13 Is this calling for this witness' opinion, or is
14 this --

15 Scientology is a religion. The court has found
16 that Scientology is a religion.

17 THE COURT: He just asked if he participated in any
18 religious services.

19 What is so difficult about that?

20 MR. LITT: What he is going to say --

21 THE COURT: I don't know what he is going to say.

22 MR. LITT: He is going to get into a discussion about
23 whether certain activities are religious or not which is not
24 justiciable. He is going to say, "No, I didn't."

25 And we'll say, "Yes, he did."

26 Is the court going to decide which is which?

27 THE COURT: I am not worried about that. I can't see
28 any big problems about that.

1 MR. HARRIS: Could I give the court a few First
2 Amendment cases?

3 THE COURT: We are not getting into any First
4 Amendment cases. He just asked him if there were religious
5 services.

6 MR. HARRIS: Is that his state of mind, Your Honor?

7 THE COURT: I have no idea what the answer is going to
8 be.

9 THE WITNESS: I believe the answer to your question,
10 if I recall the question correctly, is no.

11 Q BY MR. FLYNN: And during that period of time
12 did you participate in briefings as to who you were working
13 for when you were doing the duties you described,
14 Mr. Armstrong?

15 A Yes.

16 Q And were these regular briefings?

17 A Well, what they were was immediately that
18 someone came on board, they were briefed; they had to do a
19 pack of materials; they had to study these materials and
20 they had to drill the answers to -- before they were allowed
21 off the ship they had to be checked out on the shore story.

22 There was a Shore Story which was originated by
23 Hubbard which was the -- it was what we represented to the
24 local people.

25 Q What did you represent to the local people?

26 A We were to tell them that we were something
27 called "Operations and Transport Corporation," Limited. It
28 is a Panamanian corporation. And it was a business

1 management company; that the function of our business was
2 to -- we performed two functions. We managed other
3 businesses around the world and we were paid by a percentage
4 of increase in profits of those corporations or businesses
5 which we managed or provided managerial expertise to.

6 The other part of it was that we brought people
7 on board, both OTC personnel and personnel from other
8 corporations around the country -- around the world to train
9 on board. And we received moneys for teaching them this
10 very advanced business technology.

11 Q OTC is Operation and Transport Corporation?

12 A Yes.

13 Q Was that a profit-making corporation?

14 MR. LITT: If you know.

15 Q BY MR. FLYNN: If you know.

16 THE COURT: If you know.

17 THE WITNESS: Yes. I know on both scores.

18 What we were to represent to the local people
19 was that we were a profit-making corporation. And according
20 to the articles of OTC, we were also a profit corporation.

21 Q BY MR. FLYNN: Did you have possession of the
22 Articles of OTC at some point when you were on the ship?

23 A Yes.

24 Q Under what circumstances did you have those
25 articles, Mr. Armstrong?

26 A Well, after I was the ship's driver, I became
27 what was known as the ship's rep, ship's representative.
28 And at that time I was in charge of on board legal

1 activities.

2 I was the point of contact between the ship and
3 the customs people, the immigration, police, port
4 authorities, ship's agent and any sort of legal dealing
5 which we had of a local nature; for example, with the
6 Panamanian Consul. We were a Panamanian vessel. OTC was a
7 Panamanian corporation. And I occasionally had dealings
8 with the Panamanian Consul, that sort of thing.

9 So to answer your question, it was in the
10 context of being the ship's representative that I had OTC
11 papers.

12 Q From whom did you take your orders when you were
13 the ship's representative?

14 A The chain of command ran basically L. Ron
15 Hubbard; down to the captain. Down to the port captain;
16 down to me. That was when I was the ship's representative.

17 At any point there could be a bypass in the
18 line. So occasionally I took them directly from L. Ron
19 Hubbard or from the captain.

20 But generally, on a day-to-day basis, for most
21 activities I would take them directly from the port captain;
22 sometimes directly from L. Ron Hubbard.

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1 Q And this shore story, as you put it, what does
2 the term "shore story" mean while you were in the position
3 you were in on board the boat?

4 A Well it became obvious to me that it was a
5 cover. A shore story was a cover which was developed in order
6 to present to the local people and the local authorities
7 a different picture from what we really were.

8 Q And did you receive wage vouchers while you
9 were on board the Apollo?

10 A Yes.

11 Q And what type of wage vouchers did you receive?

12 A Well they were basically what was produced,
13 entered into evidence, but these ones had OTC on the top of
14 them.

15 Q And what was your pay, Mr. Armstrong?

16 A It varied between nothing per week up to \$17.20
17 per week.

18 Q And was it your understanding at the time that
19 you were an employee of OTC, Operation Transport Corporation?

20 A Well, it is a bit confusing. We probably in
21 a legal sense were really employees of OTC, but we weren't
22 really paid as employees of OTC. We weren't paid like normal
23 employees would be paid.

24 However, each person on board the ship had to
25 sign on the -- had to sign the ship's articles as a crew
26 member of the ship, and the reason for that was to circumvent
27 the marine regulations regarding passenger vessels because
28 the ship was not safe as a passenger vessel.

1 It would not have passed inspection, so they
2 circumvented that by having everyone sign on as a crewmember,
3 so it then became a yacht.

4 So, there was approximately between 350 and
5 430 crew on board, and each one in signing ship's articles
6 became in that way an employee of OTC, Operation Transport
7 Corporation Limited, but each person also knew that he was,
8 in fact, a member of the Sea Organization and that fact was
9 kept from the public. Local authorities were not to know that
10 we were the Sea Organization. We were to be a business
11 management corporation, so the local authorities we were to
12 tell them that we were employees of OTC.

13 When the subject of pay came up, we were to
14 either not answer or tell them that, "Oh, yes, we are very
15 paid, but I'd rather not talk about what I get."

16 Q And did you make those representations to
17 numerous people in various ports in connection with the
18 duties on board the ship?

19 A Yes, probably to thousands of people.

20 Q Now you were paid by a business management
21 corporation?

22 A Yes.

23 Q And was everyone on the ship who signed the
24 ship's articles as a crew member drilled to do the same thing?

25 A Yes.

26 MR. HARRIS: How could he possibly know, Your Honor,
27 that everybody on the ship --

28 THE COURT: Well, I don't know. This is obviously a

1 belief.

2 You can lay a further foundation as to how he
3 would have that belief.

4 Q BY MR. FLYNN: How do you know that, Mr. Armstrong?

5 A Because it was my duty to brief everyone.

6 Q And when did you assume those duties?

7 A The beginning of 1972.

8 Q And what was your title at that time?

9 A Ship's representative.

10 Q And it was your responsibility to drill these
11 people on these fabrications?

12 A Right.

13 Q And at the time --

14 MR. LITT: Objection to the term "fabrication",
15 Your Honor.

16 THE COURT: All right, I will sustain the objection.

17 Q BY MR. FLYNN: Well, at the time that you were
18 drilling these people, Mr. Armstrong, did you understand
19 that these representations were false?

20 A Yes.

21 Q And in what way were they false?

22 A Well each person knew that he was a member
23 of the Sea Organization. Additionally each person who came
24 there from an outer organization to do courses on board or
25 be audited on board knew that he was not a crew member.
26 No one knew before they were coming to the ship that they were
27 going to be OTC. Each person thought that he was coming to
28 do a Scientology course of some description, and the local

1 authorities were never told about OTC or about Scientology
2 and, in fact, we would deny any connection.

3 Q And were there training manuals to teach you to
4 lie about those facts?

5 A Well, there was packs of material. I guess
6 they could be called training manuals, but the drilling was
7 very extensive. The person had to get the shore story very
8 firmly in his mind, and I myself was trained to ask questions
9 and trip them up and then give them the information which
10 would have them broaden the story sufficiently in their own
11 mind so that they would be able to field any question if asked
12 by local people.

13 Q And who do you know that this was done in part
14 in order to avoid the marine regulations relating to
15 passenger vessels?

16 A Well, because that situation came up a number
17 of times throughout the history of my time on board in which
18 the local port authorities would, because we did not have what
19 is called a SOLAS certificate, safety of life at sea -- there
20 is a SOLAS convention which proscribes what is necessary for
21 safety equipment or standards of the ship for vessels of
22 certain tonnage with certain numbers of people on board.

1 And our vessel was not safety certificated. And
2 the way we got around that -- because the -- Hubbard did not
3 wish to bring the vessel up to standard. My guess is to
4 save money --

5 THE COURT: Let's not get involved in guesses.

6 Strike that.

7 THE WITNESS: Okay.

8 Q BY MR. FLYNN: In any event --

9 A As a result, we signed everyone on board because
10 we ran into that problem on occasion with harbor masters or
11 port authorities in various ports that we visited.

12 Q At any time on board the ship did you learn
13 whether Mr. Hubbard owned Operation Transport Corporation?

14 A Yes.

15 Q And under what circumstances did you learn that?

16 A Well, first of all, there was the original
17 articles of incorporation. And there was some information
18 on shares that were kept in the port captain's office files.

19 Additionally, in 1973, I believe OTC was
20 incorporated, in '67 or '68. But I believe it was '67.

21 In 1973 I was involved in the back-dating of
22 some Board minutes back to either the same day or the day
23 following the day of incorporation. And those Board minutes
24 took Hubbard off the Board of Directors at that time. And I
25 had to get Hubbard's signature authenticated by the
26 Panamanian Consul in Lisbon at that time.

27 I also had authenticated the signatures of the
28 other incorporators or the other original Board so that

1 their resignations were either the same day or -- Anyway,
2 the first Board minutes in the corporation, but it was six
3 years later.

4 Q How long did you remain on board the ship, the
5 Apollo?

6 A From February '71 through, I guess, September of
7 '75.

8 Q Now, at any time during that period did you
9 understand that you worked for any organization or
10 corporation other than Operation Transport Corporation?

11 A No.

12 Q At some point did you become the port captain?

13 A Yes.

14 Q And when was that, Mr. Armstrong?

15 A That was -- it was just a brief period. And
16 that was in early 1974.

17 Q What were the port captain's duties?

18 A Well, the port captain was over the ship's
19 representative and over the intelligence officer and over
20 some of the PR positions on board. And he was the captain
21 of the ship as far as the port authorities were concerned
22 when the ship was in port.

23 There was another captain who was the actual
24 captain for navigation purposes. But the port captain
25 assumed that role as far as the port authorities were
26 concerned while the ship was in port.

27 Q Now, throughout the period of time that you were
28 on board the ship did you become involved in briefings with

1 regard to whether Mr. Hubbard was receiving any money from
2 Scientology organizations?

3 A Well, that was part of the -- when I got into
4 the port captain's office, we were briefed on other subjects
5 as well because occasionally it would happen that we would
6 be noticed.

7 The ship had a prior record as being a
8 Scientology ship; additionally, Scientologists would
9 occasionally show up at the ship, hoping to come aboard or
10 to talk to Hubbard or something. So these were
11 Scientologists who were not supposed to be in the area that
12 the ship was in, but they would arrive there.

13 So we had briefing packs in which we were to
14 handle some of the questions which came up about Hubbard or
15 about Scientology. And that subject would come up. And
16 the -- about whether or not Hubbard was getting 10 percent
17 of the income of Scientology organizations.

18 That was a question which arose often in the
19 press. And we were trained to handle those questions, to
20 deny that he received any money from Scientology and to deny
21 any real connection to Scientology; that he had resigned as
22 a director in 1966.

23 Q Now, throughout the period of time that you were
24 on board the ship did you observe Mr. Hubbard's activities
25 with regard to issuing orders to ship's personnel?

26 A Well, I would have seen it, not on a daily basis
27 necessarily, but sometimes for brief periods during a day or
28 sometimes for a great length of time during a particular

1 day.

2 But I was able to see him probably hundreds of
3 times issuing orders throughout the time I was on board.

4 Q What is your understanding as to who exercised
5 ultimate supervisory authority over the day-to-day
6 activities of the ship while you were on board?

7 A Hubbard.

8 Q And were you taught to deny that that was the
9 fact when you dealt with official agencies at the various
10 ports that you went into?

11 A Yes.

12 Q And were you taught to deny that to people who
13 came to the ship asking questions about the ship or
14 Mr. Hubbard?

15 MR. LITT: Objected to, Your Honor, as leading and
16 suggestive. Asked and answered.

17 THE COURT: Overruled.

18 You can answer.

19 THE WITNESS: Yes.

20 Q BY MR. FLYNN: Throughout the period of time
21 that you were on board the ship did you participate in any
22 religious activities?

23 MR. HARRIS: Is this a characterization, Your Honor?

24 THE COURT: The activities which you believed to be
25 religious; you may answer it in that form.

26 THE WITNESS: There was -- there was one.

27 Q BY MR. FLYNN: And one in how many years?

28 A Four years. All that time, four years and

1 several months.

2 Q What was that one event?

3 A That is when I was married.

4 I wasn't really married. I should explain.

5 Q What were the circumstances surrounding your
6 marriage?

7 A Well, I was married legally off the ship. We
8 were in Free Port in the Bahamas at that point. And I got
9 married. Just prior to that we were in Nassau, one of the
10 other islands. And I got legally married.

11 Then we had a ceremony on board the ship in
12 which the Scientology wedding ceremony was read. But it
13 wasn't -- it was just a ceremony; it wasn't a marriage.

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1 Q And did Mr. Hubbard participate in your wedding?

2 A Yes.

3 Q And in what way did he participate?

4 A He gave away the bride.

5 Q And what was your wife's name?

6 A Terri, Terri Gillan.

7 Q Do you know what her present name is,
8 Mr. Armstrong?

9 A Yes, Terri Gamboa.

10 Q And do you know whether she presently has a
11 role with any of Mr. Hubbard's organizations?

12 A Yes.

13 Q And what is that?

14 A She is part of what is called ASI, Author
15 Services Incorporated.

16 Q Now throughout the period of time that you
17 were on board the ship were there on-going and continuous
18 representations made to people who came on board the ship
19 about Mr. Hubbard?

20 A Yes.

21 Q And were any of these representations made
22 in any type of a formal way?

23 A Well, yes.

24 Q And in what formal way?

25 A Right. There were briefings on board the ship
26 and, in fact, there was an LRH public relations officer on
27 board the ship who occasionally gave briefings, and the
28 briefings would be about Ron. Much of the material

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1 of the briefings would be what is contained in these exhibits.

2 Additionally, there were during the time on the
3 ship, there were some other biographical sketches created
4 on board and published on board, both mimeograph and I believe
5 notations of this nature.

6 Q Did you see Mr. Hubbard create those biographical
7 sketches?

8 A Not those ones.

9 Q Did you see him create any biographical sketches?

10 A Not the actual creation. I have seen things in
11 his hand which are identical to these materials, so I have
12 seen --

13 MR. LITT: Which materials?

14 Q BY MR. FLYNN: For example exhibit N, the long
15 biographical sketch of Mr. Hubbard in exhibit N, have you seen
16 Mr. Hubbard's handwritten biographical sketch which was
17 later typed up and made a part of exhibit N?

18 A Yes.

19 MR. HARRIS: Just so I am clear on this, Your Honor,
20 I am not sure for what purpose this is being introduced; in
21 respect to his archives post or as inducement to join the
22 Sea Organization?

23 THE COURT: Well, it goes to developing the total
24 picture as to a course of events that led up to the events
25 in question. Overruled.

26 Q BY MR. FLYNN: Did you see that, Mr. Armstrong?

27 A Yes.

28 Q Do you know where it presently is, the handwritten

1 version of exhibit N7

2 A It is -- I can tell where I last saw it.

3 Q Where did you last see it?

4 A It was in the archives in the Cedars Complex.

5 Q Now when you were working on board the ship
6 for the OTC corporation, did you have any understanding as to
7 whether or not you were also working for L. Ron Hubbard?

8 A Yes.

9 Q And what was that understanding?

10 A Well that was the real truth of what we were
11 doing. Each person -- that is who we were working for. He
12 was the Commodore of the Sea Organization. We were all
13 Sea Org members. There was no one senior to him and we all
14 worked for him.

15 THE COURT: Who was the billion year contract, who
16 were the parties to that if you can recall?

17 THE WITNESS: It was just a contract which bound me
18 to the Sea Organization.

19 THE COURT: You were the only person that signed it?

20 THE WITNESS: Yes.

21 THE COURT: Oh.

22 THE WITNESS: I should say there was a witness to my
23 signature, but that's it.

24 THE COURT: All right.

25 Q BY MR. FLYNN: Now, throughout the period
26 you were on board the ship did you have access to public
27 relations material relating to representations about
28 L. Ron Hubbard's background?

1 A I had access to this kind of material. I had
2 access also to some of what you would call unfavorable material
3 which had appeared in newspapers and magazines and that sort
4 of thing, what the organization called "entheta" so I had
5 seen and had in the port captain's office files of some of
6 that type of material.

7 Q And did your duties as port captain or ship's
8 rep relate in any way to dealing with unfavorable materials?

9 A Well, not a lot directly. We were briefed on
10 it and occasionally, as I say, someone from outer organizations
11 or from what's called the field, some other country would
12 show up at the ship and we would have to handle their questions.

13 In Curacao and actually in Barbados, Trinidad
14 and later in Curacao, and this was in the summer and fall of
15 1975, a number of questions at that time came up about
16 Hubbard because by this time the cover had been blown regarding
17 OTC and those countries had identified the ship as a
18 Scientology ship and knew that Hubbard was on board.

1 So at that point I became more intensely drilled
2 in handling Hubbard's representations.

3 Q And did you make any representations about him
4 in response to questions as to whether he was a director
5 from Hollywood?

6 A During that period of time?

7 Q Yes.

8 A Yes. As a matter of fact, because in Curacao,
9 particularly in Curacao and even earlier, we had on board
10 something called the Photo Shoot organization. And part of
11 the PR surrounding the Photo Shoot organization, which was
12 going off the ship into the community and either
13 photographing local cites or photographing staged sets and
14 scenes later to be used in scientology publications, there
15 was the PR surrounding that; that Hubbard was a Hollywood
16 director, former Hollywood director.

17 Q And were there specific movies that you
18 represented to people that he directed?

19 A No, not at that time.

20 Q At a later time?

21 A No, no. I have never heard what he had
22 directed, just that he was a Hollywood director.

23 Q Did you make any representations to people about
24 whether he had written a screenplay of the movie "The
25 Divebomber" at that time?

26 A No. The -- there was a PR -- there was a
27 biographical sketch which was created around that time. And
28 that contained a representation about "The Divebomber." But

1 I myself did not ever mention "The Divebomber" to anyone
2 until sometime later.

3 Q During the period of time that you were on board
4 the ship did you observe how people who had either made
5 mistakes or had become antagonistic to Mr. Hubbard or
6 anything that he ordered were treated?

7 A Yes.

8 Q And what did you observe?

9 MR. HARRIS: Could we have some specifics as to who
10 these individuals were?

11 THE COURT: I assume that can be developed.

12 You may continue.

13 THE WITNESS: What sticks in my mind is that in the
14 beginning of 1974 Mr. Hubbard created something called RPF,
15 the Rehabilitation Project Force, it was called. And people
16 were ordered by Hubbard, if they had -- if they had what he
17 called counter-intention, CI. And it was counter-intention
18 to his orders, his policies, and any counter-intention to
19 any project that he was involved in, what he wanted to get
20 done.

21 And people were on a daily basis throughout a
22 great deal of 1974 routed into the RPF. And the RPF was a
23 segregated group of people who were -- that were treated as
24 prisoners.

25 They had to perform -- it is something more than
26 menial tasks. It was forced labor under extreme conditions.
27 And they wore black boiler suits. And that is how they
28 stood out from the rest of the crew.

1 A great number of people were ordered by Hubbard
2 into the RPF which was created at that time.

3 Q Now, did you ever observe anyone locked up in
4 the ship's chain locker during the period you were on board
5 the Apollo?

6 MR. HARRIS: Objection. Leading and suggestive, Your
7 Honor.

8 THE COURT: Overruled.

9 THE WITNESS: during the time I was on board, yes. I
10 saw one little kid. He was a -- that is the only one during
11 that time that I recall. And he was a kid, I guess, about
12 13 or 14.

13 Q BY MR. FLYNN: How long was he locked in the
14 chain locker?

15 A I don't know exactly how long, but it was -- I'd
16 say at least a day, maybe longer.

17 Q What was the chain locker, Mr. Armstrong?

18 A The chain locker was in the bow of the ship.
19 There was two of them. We had twin anchors up forward. And
20 the chain, which had links about a foot across, when the
21 chain was drawn in and the anchor was lifted up into the
22 haws pipe, the chain fell down into about a four-foot square
23 iron -- steel tube. And that was the chain locker. It had
24 a metal lid on it.

25 Someone assigned to the chain locker would
26 simply sit on this pile of chain links during the time that
27 they were in the chain locker.

28 Q And other than your actual observation of that

1 one 13-year-old child did you understand that to be a
2 routine punishment?

3 MR. HARRIS: I don't know if we are getting a
4 compilation of hearsay, reputation, or what, Your Honor.

5 This is for his state of mind, not the
6 actuality, I presume?

7 THE COURT: He, apparently, was there for four years.
8 He probably has a pretty good idea of what discipline was
9 involved.

10 MR. LITT: Are we talking about what he knows, what he
11 heard, or what he thinks?

12 THE COURT: What he saw, observed over a period of
13 time.

14 Overruled.

15 You may answer.

16 THE WITNESS: During the time I was on board, it was
17 not a form of punishment which was often used.

18 I heard of someone else being put in during that
19 time. I don't even recall the name at this time. So it was
20 unusual.

21 Q BY MR. FLYNN: What was your mental state while
22 you were on the Apollo, Mr. Armstrong?

23 THE COURT: That covers a lot of time, counsel. I
24 don't know what you have in mind. Four years of mental
25 states?

26 Q BY MR. FLYNN: Is there any particular emotion
27 that you recall, Mr. Armstrong, as being the dominant
28 emotion while you were on board the Apollo?

1 A Yes. I think that aside from the hours in which
2 I was sleeping and occasionally during moments of relative
3 lightness, I think that I was pretty much in fear the whole
4 time.

5 THE COURT: I think we'll take a 15-minute recess.

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7 (Recess.)
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1 THE COURT: All right. In the case on trial let the
2 record reflect that counsel are in place and the witness
3 has retaken the stand.

4 Just state your name again for the record, sir.
5 You are still under oath.

6 THE WITNESS: Gerald Armstrong.

7 THE COURT: You may continue, Counsel.

8 Q BY MR. FLYNN: Now, Mr. Armstrong, do you
9 recall your testimony that you were briefed to state to
10 people inquiring about Mr. Hubbard's status on board the
11 ship that he was not receiving any money from Scientology
12 Organizations; do you recall that testimony?

13 A Yes.

14 Q Did you know why you were on board the ship
15 whether Mr. Hubbard did or did not receive funds from
16 Scientology Organizations?

17 A I did not know that.

18 Q Now in 1973 did Mr. Hubbard leave the ship for
19 a period of time?

20 A He left actually in the fall of 1972.

21 Q And for how long a period did he leave?

22 A He left -- in the fall of 1972 he moved ashore
23 to his villa in Tangiers. The ship at that point sailed to
24 Lisbon, and we were in dry dock and wet dock in Lisbon.
25 He showed up somewhere around Christmas time 1972, maybe
26 around the 1st of the year, between Christmas and the 1st of
27 the year, and he stayed at that point off the ship in a hotel
28 in Lisbon, and at that point he left and arrived back at the

13-2

1 ship in approximately September 1973.

2 Q Do you know where he went?

3 A Yes.

4 Q Where did he go?

5 A To New York.

6 MR. HARRIS: And is that personal knowledge, Your
7 Honor, or hearsay?

8 Q BY MR. FLYNN: How do you know that,
9 Mr. Armstrong?

10 A I have spoken to the two people who lived with
11 him during the time when he was in New York, and I had a
12 debrief which was written by one of the people who accompanied
13 him, and I have seen photographs which were taken of him and
14 of the area and of the house in Queens, New York where he lived.

15 Q And who were the people who were with him?

16 A Paul Preston and Jim Dincalci.

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1 Q How do you spell "Dincalci"?

2 A D-i-n-c-a-l-c-i.

3 Q And to your knowledge did Mr. Dincalci take
4 those photographs in Queens, New York?

5 A Yes.

6 Q And at a later point in time did those
7 photographs come into your possession?

8 A Some of them, yes.

9 Q And when was that?

10 A It was in April 1982.

11 Q Now, in 1974 were there a lot of inquiries about
12 Mr. Hubbard's background from people who came to the ship?

13 A I -- I don't know. There were not a lot of
14 inquiries that were made of me.

15 Q When you were the ship's representative did you
16 deal with claims from outside sources that the things that
17 were being said about Mr. Hubbard such as are set forth in
18 the various exhibits that have been marked into evidence
19 were untrue?

20 A Let me see if I get your question.

21 Did I deal with the press or anything like that
22 which contradicted the claims in these publications?

23 Q Correct.

24 A Yes. I received a number of those -- of such
25 publications which we called N-Theta during that period.

26 Q At that time did you continue to believe that
27 the representations that are set forth in exhibits N through
28 T were true?

1 A Yes.

2 Q How did you reconcile in your mind those two
3 conflicting claims, Mr. Armstrong?

4 A Well, first of all, the claims were being made
5 on one hand by Mr. Hubbard who I assumed to be telling me
6 the truth.

7 On the other hand, by people who I viewed at
8 that point as enemies. And we -- we were briefed quite
9 regularly on board about activities of the Guardian's
10 Office. And they were involved at that point in what they
11 called Dead Agent Capers, false report corrections. And
12 they were attempting -- the claim was made -- to clear up
13 false reports which were being spread about Mr. Hubbard in
14 the media and between governmental agencies.

15 Q Did you understand the term "enemy" to have a
16 particular significance in terminology used on board the
17 ship?

18 A An enemy of Scientology was someone who was
19 critical of Scientology, critical of Mr. Hubbard; someone
20 who printed something derogatory about Mr. Hubbard. It was
21 the psychiatrists, psychologists, the medical profession;
22 these were -- the IRS, CIA, FBI; these were the agencies
23 which were the enemies of mankind and the enemies of
24 Scientology.

25 MR. HARRIS: Is this his understanding, Your Honor? I
26 take it it is still going in for that purpose. Because
27 right now there has been utterly no foundation laid.

28 THE COURT: The man was on board the ship for four

1 years; he was deck captain; it would seem that he would have
2 some familiarity with what was happening and what was being
3 discussed and the things that were going on.

4 You certainly have a right to cross-examine on
5 all of these matters.

6 Q BY MR. FLYNN: In 1974 did you learn that there
7 were policies that related to how to deal with enemies?

8 A Yes. There was a number of -- there were a
9 number of policies which dealt with that.

10 In 19- -- by 1974 I had been the port captain.
11 And I was also in 1974 the intelligence officer on board the
12 ship. And I knew through the intelligence officer policies
13 and intelligence officer hat which was originated by L. Ron
14 Hubbard that there was a certain approach taken to enemies.

15 I also knew that -- prior to that, from briefing
16 packs of materials the existence of something which was
17 called the "Fair Game Doctrine" and that set up the way in
18 which enemies were to be treated, were to be viewed. That
19 is principally it.

20 Q Now, in 1974 did Mr. Hubbard deliver what was
21 called a source briefing?

22 A Yes.

23 Q And what was that, Mr. Armstrong?

24 A A number of people, maybe somewhere between 10
25 and 20 people on board the ship were chosen to be PRs,
26 public relations personnel. And each one of them was
27 briefed by Hubbard. They were all briefed together. And it
28 was called a source briefing.

1 Packs of materials was given -- were given to
2 each of these people. And then they were sent out to all of
3 the organizations and missions or franchises
4 internationally. And they gave lectures or talks or
5 briefings to all the people at these centers
6 internationally.

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1 Q And what did Mr. Hubbard say in these briefings
2 relative to his biographical background?

3 MR. LITT: Just a moment. I don't think it has been
4 established whether or not Mr. Armstrong was at these briefings
5 or I guess it is a briefing.

6 THE COURT: You can develop that as to whether he was
7 or he wasn't.

8 Q BY MR. FLYNN: Were you there, Mr. Armstrong?

9 A No.

10 Q Did you at some point receive materials from
11 these briefings?

12 A Yes.

13 Q What materials did you receive?

14 A I received a -- the pack of materials which
15 the various public relations people took with them when they
16 gave the briefings, and I received the transcript of the
17 briefing that Mr. Hubbard gave to all these missionaries
18 before they were sent around the world.

19 Q And where did you receive this pack of materials
20 from or who did you receive it from?

21 A Well, the pack of materials was people on the
22 ship were also the recipients of a source briefing, so
23 one of the people did that and I only caught a part of it,
24 but I did have the pack of materials relating to Mr. Hubbard
25 at that time. So it would be 1974.

26 Later in 1980 when I was actually in Hubbard's
27 PR bureau, I had the pack and I also had the transcript of
28 the briefing.

1 Q Now in 1974 did you read at least a part of
2 the briefing relating to certain medals that Mr. Hubbard
3 claimed he received in World War II?

4 A 1974?

5 Q Correct.

6 A Well, yes, that is the part that actually sticks
7 out in my mind, and that is because a color plate was made,
8 a big eight by ten color photo of the medals which Mr. Hubbard
9 claimed to have learned during the war. In that photograph
10 there was 21 medals and palms. A couple of the medals had
11 palms on them, and subsequently I saw in the briefing that he
12 had said, "Well, actually there was 28 and that some of
13 them are missing."

14 He claimed that some he was given in secret
15 and they actually couldn't award it to him, and this had to
16 do with sinking a couple of enemy submarines, and the reason
17 why he could not be awarded those things out in the open
18 was because it would have been embarrassing to the naval
19 command to have had a couple of subs sunk in their own back
20 yard.

21 MR. HARRIS: Just because I am totally unclear about
22 this, the source of this is he hearing Mr. Hubbard saying
23 this ^{is} or/he reading something in 1980 or 1974? Very unclear.

24 THE COURT: Okay, will you tell us?

25 THE WITNESS: The first one was in 1974. At that time
26 I saw the color print which was made available.

27 At that time I also knew of the claim that there
28 was more involved there.

1 Subsequently I had possession of the transcript.
2 This would be in 1980 and I possessed it throughout the course
3 of the biography research and also provided it/Omar Garrison.
4 So from that point on it sticks in my mind very vividly.

5 Q BY MR. FLYNN: Now, at some point in time did you
6 leave the Apollo, Mr. Armstrong?

7 A Yes.

8 Q And when was that?

9 A In September of 1975.

10 Q And where did you go?

11 A I went on a leave with my wife at the time.

12 Q Who was then Terri Gamboa -- Terri Gamboa
13 Armstrong?

14 A Terri Gillam Armstrong, yes.

15 Q How long was your leave?

16 A About a month.

17 Q And after your leave, where did you go?

18 A To Daytona Beach.

19 Q And did you meet Mr. Hubbard in Daytona Beach?

20 A I just saw him real briefly.

21 Q And did you begin assuming certain duties for
22 any organizations relating to Scientology and Daytona Beach
23 at that time?

24 A At that time -- some time in October, November
25 of '75 I was for perhaps two or three weeks, I was in the
26 Guardian's office in the intelligence bureau. We had a very
27 small guardian's office at -- it was a motel we were
28 occupying under the name United Churches.

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1 Q Were you paid at that time?

2 A Yes.

3 Q And what organization or corporation were you
4 paid by during that period of time?

5 A Well, there was no name on any disbursement
6 voucher at that time and I never asked at that time who I
7 was paid by.

8 Q And were you paid in cash?

9 A Yes.

10 Q And what was your understanding as to what
11 corporation you worked for, if any?

12 A Well, it was unclear at that point because we
13 were told that we were United Churches, United Church of
14 Florida, so it really depended on who I was talking to.

15 The only thing I knew for certain, and this
16 was the only thing which was certain throughout the whole
17 time I was in the Sea Org was that I worked for L. Ron Hubbard.
18 What corporation I was a part of was extremely unclear, and
19 for the most part each one of us involved, and I think at-
20 least myself, I knew that I worked for the Sea Organization
21 for L. Ron Hubbard. The rest of it was simply a facade
22 and it was a cover of some sort. So who I worked for back
23 then, I am not sure.

24 Q Now, what were your duties in Daytona Beach?

25 A I had two jobs in Daytona Beach. The first one
26 was in the Guardian's office, and in the Guardian's office I
27 was principally involved at that point in coding and decoding
28 telexes and gathering local intelligence, and I dealt with the
29 destruction of security materials.

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1 Q And when you say coding and decoding, what did
2 that involve, Mr. Armstrong?

3 A All telexes in and out of the Guardian's office
4 were coded and decoded.

5 We had a number and letter system and a
6 transposition system. And each telex had to be put into a
7 particular code. And when we received a telex which was in
8 a particular code, we had to decode it so that it was then
9 in plain English.

10 Q How many codes were there?

11 A Well, at that point there were two codes in use
12 by my office. And one was the Guardian's office code and one
13 was the office of the controller code.

14 The office of the controller was, in fact, the
15 same office that I was in at this time.

16 Q Do you know how many codes the Guardian's
17 office used at that time other than the two codes that you
18 were directly involved in?

19 A No -- I should say there was a third code at
20 that time that I knew of. And that was a code between the
21 Guardian's office Ounter Organizations, small organizations;
22 one between GOUS, which was the central Guardian office head-
23 quarters in North America. And then there were the Ounter
24 Guardian's office; for example, New York may have a junior
25 Guardian's office. And they had a particular telex code at
26 that time. So I had actually the three codes, one between
27 GOUS and U and GOWW. Guardian's office worldwide from UK
28 would use the same code. And then there was the controller's

16-2

1 code.

2 Q You mentioned you were involved in the destruction
3 of security documents; what did that involve?

4 A Well, at that time we simply took out whatever
5 was not an active file. And it could be a telex master.
6 It could be that sort of thing. And I took and burned it.

7 We did not have at that small project shredding
8 facilities to amount to anything, not enough to handle the
9 volume that we had.

10 So I went down the coast, Daytona Beach,
11 and in an incinerator burned the stuff.

12 Q Were there instructions on what to destroy
13 and what not to destroy?

14 A Nothing that I was aware of at that time.

15 This was simply material that was given to me
16 by the various people in the office.

17 Q So you were just ordered to destroy it?

18 A Right.

19 Q And what other duties did you have other than
20 those duties in the Guardian's office in Daytona?

21 A I was busted, I guess you would say, from the
22 Guardian's office at that time.

23 The I worked on a project -- this had to do
24 with the move into Clearwater, Florida by the personnel
25 from the ship and by the Guardian's office. And we were
26 part of that. We were like a staging area from which the
27 overall plan was originated and coordinated by Mr. Hubbard.
28 And he operated several missions, probably dozens of missions

1 at that time.

2 And I was at that time busted to the mimeo unit.
3 So I was printing mission and project orders originated by
4 Mr. Hubbard and on which people would be brief and then fired
5 to Clearwater or to some other location to perform part of
6 their overall move into Clearwater.

7 The ship at that point was in free port in the
8 Bahamas. So it was a major task to bring all the materials
9 from the ship in containers to the base and to establish the
10 various facilities in Clearwater, the Fort Harrison Hotel,
11 the Bank of Clearwater building and other buildings.

12 Q Now, when this move to Clearwater took place as
13 supervised and coordinated by Mr. Hubbard, did the move take
14 place under the name of the Church of Scientology?

15 A No.

16 Q Under what name did it take place?

17 A The property was purchased in the name of
18 Southern Land Development. I believe it was a corporation.

19 The organization then became United Churches of
20 Florida. That was the shore story at the time. And that
21 was the cover which we used up until the beginning of 1976
22 or a little later.

23 Q Did you know that the cover using the name
24 United Churches of Florida was a lie?

25 A Yes.

26 MR. LITT: Objection. What --

27 THE COURT: The words of what they are. I don't know
28 what you mean by "a lie."

1 Q BY MR. FLYNN: In fact, was their organization
2 that existed called United Churches of Florida?

3 THE COURT: If you know.

4 Q BY MR. FLYNN: If you know.

5 A I believe that it was registered or incorporated
6 in this way.

7 Were we in fact United Churches of Florida? No.

8 Q And when you used the term "mission" what did
9 you mean by that term, Mr. Armstrong?

10 A I guess the equivalent would be a military
11 mission, people sent in to perform a particular operation
12 in another location and then brought back to a base of
13 operations.

14 Q Now, at the time of that move did you know
15 Mr. Dincalci?

16 A Yes.

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1 Q And to your knowledge did Mr. Dincalci make a
2 tape recording of orders of L. Ron Hubbard relating to this
3 mission?

4 A Well that is my knowledge now. I did not know
5 about it at the time.

6 MR. LITT: Is that knowledge based on hearsay or
7 personal knowledge?

8 Q BY MR. FLYNN: How did you learn about the tape
9 recording, Mr. Armstrong?

10 A I was given a copy of it by Mr. Dincalci.

11 Q And was it Mr. Dincalci's tape recording?

12 A Yes.

13 Q And during that period of time what term did
14 Mr. Hubbard use to describe a Scientology organization?

15 THE COURT: Well, wait a minute. Are you talking about--
16 you said "during that time"; is that something that he learned
17 at that time or that he learned now?

18 Q BY MR. FLYNN: During the period of the move
19 to Clearwater in 1975 did Mr. Hubbard use a term in your
20 presence regarding Scientology organizations?

21 A The only thing I can think of is Org.

22 Q At that period of time did you hear the tape-
23 recording?

24 A No.

25 Q At a subsequent time did you hear the tape-
26 recording?

27 A Yes.

28 Q And do you recall hearing the words "the

1 company" on the tape recording?

2 MR. LITT: Your Honor, this is improper. If
3 Mr. Armstrong is listening to a tape recording provided to
4 him by one Jim Dincalci, which tape recording has not been
5 authenticated in any way, Mr. Dincalci is going to testify.

6 THE COURT: All right, I think you are correct, Counsel.

7 MR. FLYNN: I will withdraw it.

8 Q Did you ever hear Mr. Hubbard use the term
9 "the company" to describe Scientology organizations?

10 THE COURT: Other than on the tape.

11 Q BY MR. FLYNN: Other than on the tape?

12 A I don't believe so. I don't think it ever came
13 up.

14 Q Now, when you were working on the mimeo machine,
15 were you in a particular office of L. Ron Hubbard?

16 A I was not in what was actually called the personal
17 office of L. Ron Hubbard at that time.

18 Q At some time did you move into the personal
19 office of L. Ron Hubbard?

20 A That followed the mimeo machine.

21 Q And when was that?

22 A That was the beginning of December 1975.

23 Q And where was that office located?

24 A Well the personal office -- there were personal
25 office personnel who were with Hubbard in Daytona Beach. He
26 was living at that time in a hotel near, you know, a couple
27 of hundred yards from the motel where all of us were staying
28 who were in Daytona Beach.

1 At one point I was assigned to the personnel
2 office and I was briefed up in Hubbard's suite of offices
3 by Mike Douglas who was one of Hubbard's personal staff.

4 Following the briefing I was sent to Dunedin,
5 Florida which is about six miles from Clearwater, and it was
6 in Dunedin where I stayed for the next several months in
7 Hubbard's personal office.

8 Q And was Mr. Hubbard there?

9 A Hubbard arrived about four or five days, maybe
10 three or four days after I arrived in Dunedin. I arrived
11 in order to set up the communication lines, the telex machine
12 and mail lines and that sort of thing, and to get the place
13 ready for his arrival, so he arrived a couple of days later.

14 Q Now when you were working in the personnel
15 office of L. Ron Hubbard, what was your understanding as to
16 who you worked for?

17 A L. Ron Hubbard.

18 Q And what did you do in Dunedin?

19 A I was the -- for the first couple of months I
20 was the deputy LRH External Com Aide, and the External Com
21 Aide was Mike Douglas, and I was involved at that point in
22 again coding and decoding telexes, and the receipt and
23 distribution of mail which came to all the people in the
24 personal office who were staying in Dunedin and in the sending,
25 the transmittal of mail from Hubbard and from the others
26 in the personal office out to organizations, either in
27 Clearwater or across the world.

28 Q And what, in general, did this telex traffic --

1 is that the term that was used, "telex traffic"?

2 A Yes.

3 Q What in general does the telex traffic relate
4 to?

5 A Well, I had two sets of telex traffic at that
6 time, and I was using two codes at that time.

7 We were at that time called UCE, United Churches
8 Extension, and the reason for that was to get the telex
9 machine established in this -- it was actually a condominium
10 project.

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1 And in order to lease the Telex machine there we
2 used the name United Churches Extension.

3 The traffic related or was for the controller's
4 office or for L. Ron Hubbard. and so we used two codes.
5 One was the controller's code; one was the LRH code.

6 Q Now, did you make any observations at that time
7 as to whether Mr. Hubbard was managing or directing
8 Scientology organizations throughout the world?

9 A Well, yes.

10 Q What observations did you make?

11 A That was that he was. He was -- whatever he
12 cared to look at, he looked at. And whatever he cared to
13 handle, he handled.

14 He was senior to anyone anywhere.

15 Q At that time did you receive wage vouchers in
16 connection with your pay?

17 A Yes.

18 Q And what, if anything, was on the wage vouchers?

19 A They were blank.

20 Q Were you paid in cash?

21 A Yes.

22 Q After you worked in Dunedin where did you go?

23 A I think approximately May, late May 1976 I took
24 a -- I, along with three other people, we were fired on a
25 mission to establish a staging area for Mr. Hubbard in
26 Culver City here in Los Angeles. And we drove across the
27 country taking with us a Telex machine.

28 Whenever we needed to at that point set up

1 communication lines within the -- it was an apartment
2 complex in Culver City. And we took three or four days to
3 get across the States. And then I spent another week or so
4 in the Culver area, Culver City staging area, code name
5 Astra, A-s-t-r-a.

6 Q What did you do in Culver City?

7 A I established a -- set up a Telex machine; set
8 up a phonetic coupler line between our Telex machine and the
9 GOUS Telex machine; set up a Telex machine in the Guardian's
10 Office, Telex room in GOUS which was then in the Feifield
11 Manor in Hollywood.

12 We set up a mail and air freight line between
13 our unit and GOUS and between GOUS, which was, again, in
14 Feifield and Clearwater and the UK.

15 Q Did Mr. Hubbard at some point arrive at Astra?

16 A Yes.

17 Q And when was that?

18 A It was about a week after my first arrival
19 there.

20 First Mary Sue arrived. And she was there for a
21 couple of days and then Hubbard arrived.

22 Q Now, were all of these moves, the move into
23 Dunedin and the move to Astra done with great security and
24 under-cover?

25 A Yes.

26 Q What was your understanding as to why that was
27 done, Mr. Armstrong?

28 A Well, at that time in Dunedin or -- Mr. Hubbard

1 had been identified as living in Dunedin at that time. And
2 also there were a number of situations arising in Clearwater
3 which stemmed from Guardian's Office operations in
4 Clearwater, again, the local officials and also there was a
5 great deal of public upset toward Scientology in Clearwater,
6 principally because of their arrival under a false cover,
7 United Churches.

8 And the press was engaged in what Scientology
9 called an attack on Scientology at that time and on Hubbard.

10 There was a fear at that time that Hubbard was
11 going to be served, either as a witness or as a party in one
12 of the actions which were being brought at that time. And
13 so he fled.

14 And the cover into Astra was very tight. And it
15 was simply to be a staging area from which a personal
16 residence could be set up for Hubbard which would be very
17 secure.

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1 Q Now, when you were at Astra, what was your
2 understanding as to who you worked for?

3 A L. Ron Hubbard.

4 Q Did you consider your work for L. Ron Hubbard
5 to be separate and apart from any Church of Scientology?

6 A In a sense. See, this is two levels of this,
7 you know, working for L. Ron Hubbard. Everyone in the SEA
8 ORG. knew that they were working for L. Ron Hubbard, but
9 additionally, anyone who worked in the personal office
10 worked for him personally, and that had more weight than just
11 someone working broadly. I was in another position again
12 where I was actually living with the man, so I worked for him
13 just in the sense that I was in the SEA Organization.

14 I worked for him by virtue of the fact that I
15 was in the personal office and I worked for him by virtue of
16 the fact that I was living with him and taking all my orders
17 from him.

18 Q When you were in Astra, what year are we in,
19 what month?

20 A May and the beginning of June, 1976.

21 Q Now, up to that point in time, did you ever
22 understand that you worked for the Church of Scientology of
23 California?

24 A No.

25 Q After working in Astra, what did you do?

26 A I was ordered by Hubbard to be locked up, and I
27 spent about three weeks under guard in the Fiefield Manor in
28 the GOUS Building.

19.2

1 Q And why were you ordered by Hubbard to be
2 locked up?

3 A Because I had sworn at Mary Sue's communicator
4 and he deemed me at that point a security risk. They had
5 some concern that the cover or the location or Astra might
6 be blown, and so I was, for security reasons, locked up.

7 Q And when you say "locked up," were you actually
8 locked in a room?

9 A Yes.

10 Q And was there actually a guard at the door?

11 A Yes.

12 Q When you say "security risk," what type of a
13 security risk were you?

14 A Well, I wasn't a security risk, but what I --
15 they were concerned at that point, and Hubbard was very
16 concerned that his location might become known, at which
17 point someone could serve him with papers in one of the
18 actions originating from Clearwater.

19 MR. HARRIS: Just so I am sure. This is the witness
20 talking to Mr. Hubbard about his concern?

21 MR. LITT: Is this based on a statement made by
22 Mr. Hubbard or his state of mind?

23 THE COURT: Gentlemen, let's just one lawyer object
24 at a time.

25 MR. LITT: I apologize.

26 THE COURT: Are you relying now about personal knowledge
27 or what, sir?

28 THE WITNESS: Your Honor, I was told by two people.

19.3

1 One was Mike Douglas who was my direct senior at that time,
2 and the other one was the person who picked me up, and he
3 was the head of the intelligence bureau at that time, Dick
4 Weigand, intelligence bureau in GOUS, and he told me at that
5 time that Hubbard had requested it. I never spoke to Hubbard
6 at that time.

7 Q BY MR. FLYNN: What was the command line?

8 MR. LITT: Well, wait.

9 MR. HARRIS: I take it all of this is apparently being
10 offered for the man's state of mind at this point? Because we
11 are getting multiple hearsay.

12 THE COURT: Well, state of mind. Also shows his
13 relationship to the organization, his contention who he was
14 working for and whatever rights and obligations he had at a
15 later date when all of the events germinated here.

16 MR. HARRIS: Well, as long as we are clear what is
17 hearsay and what is personal knowledge. There's been a lot of
18 vast generalities.

19 THE COURT: Well, there is a statement made by an
20 agent within the scope of his authority as the agent of the
21 principal. There are a lot of things here which seem to be
22 relevant material and competent evidence. So let's go forward.

23 Q BY MR. FLYNN: At that time, Mr. Armstrong, what
24 was the command line within the personal office that you
25 worked in?

26 A L. Ron Hubbard to Mike Douglas to me.

27 Q So it was Michael Douglas and Mr. Weigand
28 personally came and picked you up and locked you up?

19.4

1 A That is correct.

2 Q During the period you were locked up, where did
3 you eat your meals?

4 A In the same room.

5 Q Were you ever allowed to leave the room?

6 A I was taken out every -- after the first
7 approximately ten days, a week to ten days, I was taken out
8 and I was driven on a daily basis to the UCLA Library.

9 Q And what did you do there?

10 A I had to go through the microfilm records to
11 locate and copy any information on -- there was a number of
12 medical doctors and some psychiatrists. There was a list of
13 names. These were people who were all deemed enemies of
14 the organization or people who had been critical of Hubbard.

15 Q Now, after your period of being locked up,
16 where did you go then -- strike that.

17 Were you paid during that period?

18 A No.

19 Q After being locked up, where did you go?

20 A Then during the last couple of days of my being
21 locked up, I was joined by my wife at the time, Terri. And
22 the last couple of days we were both locked up.

23 We were brought a Telex which was from Hubbard
24 which he had sent to GOUS, and it was shown to us and read to
25 us, and it said that we were ordered returned to Clearwater.
26 Hubbard ordered us returned, so we went sent or we were
27 actually accompanied by a B-1 -- B-1 is the intelligence
28 bureau, and Dick Weigand assigned one of the B-1 agents to

1 accompany us, and we were flown back to Clearwater, Florida.

2 Upon our arrival in Clearwater, we were taken
3 to what is called the bank building, to LRH's personal
4 communicator who at that time was Ken Urquhart, and he
5 showed us and read us a Telex which he had received from
6 Hubbard in which it said that Terri and Gerry are assigned
7 to the RPF, and so I spent the next 17 months in RPF.

8 Q What was the grounds for your being assigned
9 to the RPF?

10 A The way it read was, "Gerry attacked the
11 Guardian's Office, and Terri went into agreement with him."

12 And then there was an issue which was brought
13 out subsequently which stated that, and the order stated the
14 charge was insubordination.

1 Q Now, while in the RPF what did you do?

2 A Well, when -- when Terry and I first entered RPF
3 we were the only people at that time. There were only two
4 people in the RPF. And we began -- we gathered up -- we
5 found a place to stay at that time.

6 We were staying in the -- in one of the
7 bathrooms in the laundry room in the Fort Harrison. And
8 then another few people joined us within a couple of days or
9 weeks and we moved up to a storage room up on the 10th floor
10 of Fort Harrison.

11 And I was at that time, just due to the fact I
12 was first assigned, I was the head of the RPF. Within the
13 RPF I was called the RPF boatswain. And we worked on menial
14 tasks and we assembled the course packs and the materials
15 which are necessary to get out of the RPF.

16 There is a certain course which you have to
17 follow, a certain procedure, certain steps that you have to
18 go through to get out of this condition in which you are
19 assigned.

20 The RPF grew throughout that period up until the
21 point where I left, there was approximately 100 people in
22 it. And I finally got out after -- on December 1st, 1977.

23 Q Now, during that period of time did you make any
24 observations as to the level of paranoia within the
25 organization about security?

26 A Well, security was --

27 MR. LITT: Your Honor, this is opinion, I take it?

28 THE COURT: Well, this is, you know --

1 MR. HARRIS: Unless he is qualified, Your Honor.

2 MR. FLYNN: I'll withdraw it, Your Honor.

3 THE COURT: All right.

4 Q BY MR. FLYNN: While in the RPF did you receive
5 pay?

6 A Yes.

7 Q What did you receive?

8 A \$4.30 a week.

9 Q How many hours a week were you working?

10 A I guess 100 or more hours.

11 Q And, incidentally, while you were on the Apollo,
12 on the average how many hours a week did you work,
13 Mr. Armstrong?

14 A 120 hours.

15 Q And while you were in the personal office of
16 L. Ron Hubbard at Dunedin and Astra, on the average how many
17 hours a week did you work?

18 A 100.

19 Q Up to the time that you went into the RPF did
20 you ever have any understanding in your mind that you worked
21 for the Church of Scientology of California?

22 A Huh?

23 Q Did you ever understand that you worked for the
24 Church of Scientology of California?

25 A I'm sorry. I --

26 THE COURT: We'll take a five-minute recess.

27

28

(Recess.)

1 THE COURT: We are back in session.

2 The witness has retaken the stand.

3 State your name again for the record. You are
4 still under oath.

5 THE WITNESS: Gerald Armstrong.

6 Q BY MR. FLYNN: Up to the time you were in the
7 RPF, Mr. Armstrong, did you ever understand that you worked
8 for the Church of Scientology of California?

9 A No.

10 Q And while you were in the RPF was it your
11 understanding that you worked for the Church of Scientology
12 of California?

13 A At this time, during this period, I understood
14 that the cover came up United Churches and at that -- or
15 sometime in there, the organization, that is, all the people
16 in Clearwater, whatever those corporations were, were set in
17 corporately under Church of Scientology of California.

18 I heard about that just in either the rumor line
19 or passing of information back and forth.

20 I don't believe I ever saw any documents to that
21 effect.

22 All I knew for a fact was that I was in the RPF;
23 I was part of the SEA organization and I worked for L. Ron
24 Hubbard.

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21.1

1 Q Now, let me show you something. Appears to bear
2 the date of March 18, 1977.

3 MR. LITT: Can we see the document?

4 MR. FLYNN: Here is a copy for you.

5 May this be marked exhibit next in order, Your
6 Honor? I believe it is W.

7 THE COURT: U.

8 Q BY MR. FLYNN: Do you recall that document,
9 Mr. Armstrong?

10 A Yes.

11 Q And do you recall signing it?

12 A I am not totally positive signing it. I signed
13 during that period a number of documents, and I know that
14 there was either one or two or three documents like this,
15 all of which I signed, so I don't recall exactly when I did
16 sign it. I know that I never signed -- I know that I did
17 not sign in front of a notary public, but I did sign a
18 number of such documents.

19 Q And what were the circumstances under which
20 you signed documents?

21 MR. LITT: All documents? This document?

22 Q BY MR. FLYNN: These series of documents that
23 you just testified about.

24 A They were given to us to sign. We were
25 ordered to sign. Everyone in the RPF signed them.

26 Q And did you read them?

27 A I don't believe so. I never understood them.
28 It wouldn't have mattered anyway.

21.2

1 Q If you had been ordered to sign them, you
2 would have signed regardless of what they said; is that your
3 testimony?

4 MR. LITT: Objection; leading.

5 THE COURT: All right.

6 You can rephrase your question.

7 Q BY MR. FLYNN: Would you have signed those
8 documents under any circumstances at that time, Mr. Armstrong?

9 MR. LITT: Same objection.

10 THE COURT: Overruled.

11 THE WITNESS: I would have signed virtually anything
12 at that time.

13 Q BY MR. FLYNN: Did you understand Exhibit U to
14 be a non-disclosure and release bond at the time you signed it?

15 A Frankly, I still don't know exactly what a non-
16 disclosure and release bond was. It may have had that name
17 at the top. It undoubtedly did, but what that means, I
18 definitely wasn't certain then and I still am not.

19 Q Did you understand when you signed this
20 document that you were bound to the Church of Scientology of
21 California to pay the sum of \$10,000 if you disclosed any
22 information, data or knowledge about the Church of Scientology?

23 A I believe I heard that at the time, yes.

24 Q You heard that. Was that explained to you?

25 A No, nothing was explained to me, but I have
26 signed probably -- I don't know, seven or eight of such
27 documents to do with various things, and I understood that
28 there was various dollar amounts involved.

21.3
1 Q Now, in 1977, did you receive a W-2 Form from
2 the Church of Scientology of California?

3 A I don't believe so.

4 Q Let me show you a wage and tax statement
5 dated 1977. Did you receive that, Mr. Armstrong?

6 A No, not until it was produced in this case.

7 Q And there is one for 1978; is that true?

8 A Yes.

9 MR. FLYNN: Apparently, Your Honor, I don't have an
10 extra copy.

11 Would you hand that to the Court, Mr. Armstrong,
12 and may that be marked next in order, Your Honor?

13 THE COURT: Okay. V, as in Victor.

14 Q BY MR. FLYNN: Now in the 1977 wage and tax
15 statement, do you see where you were paid some \$340 or so?

16 A Yes.

17 Q And do you recall receiving any amounts of
18 cash in 1977?

19 A Everything was cash.

20 Q Were there any wage vouchers that said the
21 Church of Scientology of California on them?

22 A No.

23 Q And in 1978, according to Exhibit W, how much --

24 THE COURT: You mean V.

25 MR. FLYNN: Pardon me. Exhibit V.

26 Q How much were you paid?

27 A \$34.40.

28 Q Now, did you receive any wage or tax statements

21.4
1 from any other organization relating to the Church of
2 Scientology in 1978?

3 A I don't believe so.

4 Q In 1978, did you receive funds greater than
5 \$34 from any source for wages?

6 A Yes.

7 Q And how much did you receive greater than the
8 \$34 that is reflected on that exhibit?

9 A Maybe \$800.

10 Q And where did you receive that money from?

11 A That was -- at that time, I was in La Quinta,
12 California, and I was paid by the treasury in La Quinta.

13 Q Did you receive a wage or tax statement for
14 that \$800 that you just testified about?

15 A I don't believe so.

16 Q Do you know whether one exists?

17 A No.

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1 Q When did you arrive at La Quinta?

2 A December 30, 1977.

3 Q And that was after you left the RPF?

4 A Yes, sir.

5 Q And what were your duties as La Quinta?

6 A I was involved for the first six months or so in
7 making movies. I worked in virtually all the departments of
8 the production of movies that was going on at La Quinta.

9 Q Was there a term that described the location or
10 base at La Quinta?

11 A We were called a number of things.

12 We were called "SU" which meant "Special Unit."

13 We were also called during that period -- this
14 was the property known as WHQ, Winter Headquarters. There
15 was supposed to be another one set up so that we could move
16 from place to place. It was going to be Summer
17 Headquarters.

18 Q Who were you working for then?

19 A L. Ron Hubbard.

20 Q What type of movies were you making?

21 A They were movies concerning Scientology.

22 Q And did you have a cover story there?

23 A Yes.

24 Q As to who you were working for?

25 A Yes.

26 Q And did you receive briefings on that cover
27 story?

28 A Yes.

1 Q What was the cover story?

2 A There were two which developed during that
3 period.

4 The first one was that everyone on the property
5 was there because we were friends of Norton Karno who was, I
6 later found out, Hubbard's tax attorney.

7 The next story had to do with we were making
8 educational movies and they formed a movie company called
9 "Perfect Pictures."

10 So when I was out there was times when I was the
11 location scout. And when I set up various locations for
12 shooting movies, I used the name "Perfect Pictures" and the
13 people involved in the shooting of the movies, many of them
14 had Perfect Picture T-shirts. So it looked like a movie
15 company.

16 Q Was it your understanding that this movie
17 company was under the control and direction of L. Ron
18 Hubbard?

19 A Yes.

20 Q What was your understanding as to -- if any --
21 whether that company was related to the Church of
22 Scientology?

23 A Well, it was related to the Church of
24 Scientology because everyone who was making movies was a
25 SEA ORG member.

26 Hubbard was the head of the Church of
27 Scientology; the head of SEA ORG. We were all connected
28 through him.

1 Q Did he control all the details of your work?

2 A Yes.

3 Q Did you personally take directions from him
4 during that period of time?

5 A Yes.

6 Q What were the command lines while you were at
7 the Special Unit at La Quinta?

8 A When -- generally they ran directly from Hubbard
9 via a messenger to me on whatever function that I was doing.

10 The messengers, as ordered by Hubbard, were in
11 control of virtually every aspect of it down to the most
12 minute detail.

13 On some matters I would have an organizational
14 senior who I would either also receive orders from or who
15 would relay the orders from Hubbard or from the messengers.

16 My senior during a great deal of my time was
17 Norman Starky.

18 Q Now, were these messengers referred to at that
19 period of time as "Commodores Messengers"?

20 A Yes.

21 Q What was a Commodores Messenger?

22 A The Commodores Messengers were individuals; they
23 were generally young people who were Hubbard's personal
24 messengers. And they relayed orders from him and relayed
25 information to him.

26 Q Now, did L. Ron Hubbard issue at that time what
27 I believe has been marked as exhibit K, a flag order, 3729
28 issued under his name as L. Ron Hubbard, Commodore; the

1 subject of Commodores Messengers?

2 A Yes.

3 Q Now, did the command lines of the Special Unit
4 follow the orders of L. Ron Hubbard as set forth in
5 exhibit K?

6 A Yes.

7 Q And what was the practice or understanding among
8 people at the Special Unit such as yourself as to obedience
9 to an order of a messenger?

10 A Must be obeyed.

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1 Q And was it to be obeyed precisely as an order
2 emanating from L. Ron Hubbard?

3 A Yes.

4 Q Now, during that period of time did you also
5 receive blank wage vouchers and get paid in cash?

6 A Yes.

7 Q And did you have an understanding as to
8 whether this film unit was the personal film unit of
9 L. Ron Hubbard?

10 A Yes.

11 Q And was it commonly referred to as such by the
12 people working on it?

13 A Yes.

14 Q How long did you work in the special unit,
15 Mr. Armstrong?

16 A The special unit came to be known as both a
17 location and as a sub-group in that location. We changed
18 locations at the end of 1978 during a time when I was again
19 in the RPF.

20 Q And why were you ordered to the RPF at that
21 time?

22 A I was assigned by L. Ron Hubbard for -- he
23 thought that I was joking about a -- about his film production.

24 Q And how long did you spend in the RPF?

25 A Eight months.

26 Q And where was the RPF located at that time?

27 A In La Quinta and then in December we moved to
28 Gilman Hot Springs.

23.2

1 Q And what were your duties or what did you do
2 in the RPF during that period of time?

3 A Principally during that time we had -- during
4 the time that we were in the La Quinta area we worked majorly
5 on L. Ron Hubbard's house which was in La Quinta.

6 We tiled the floors. We painted it. We
7 carpeted it. We cleaned the whole place out. Took out all
8 the insulation, reinsulated all the heat and air ducts, and
9 that is mainly what La Quinta was about.

10 Sometime in early December we moved from
11 La Quinta, the RPF moved from La Quinta to Gilman Hot
12 Springs; and in Gilman Hot Springs again we were working on
13 a house which was being renovated on the Gilman Hot Springs
14 property for Hubbard.

15 Q And how much did you get paid during that
16 period of time?

17 A \$8.60 a week.

18 Q And how many hours a week were you working?

19 A Oh, probably 120.

20 Q And did all of that work relate to working on
21 L. Ron Hubbard's house?

22 A Yes.

23 Q Do you know in whose name the property was
24 held that was L. Ron Hubbard's house?

25 A I didn't know at the time.

26 Q Did you subsequently learn?

27 A I obtained a deed for the property from the
28 Riverside County Recorder's Office.

23.3

1 Q And was that as part of your archives duties?

2 A That was subsequent to the -- after I left the
3 organization.

4 Q Did you have any understanding as to whether
5 that property belonged to the Church of Scientology of
6 California when you were working on L. Ron Hubbard's house?

7 A No.

8 Q Was L. Ron Hubbard living in the house that you
9 were working on at the time?

10 A No, the working -- well, I was in the RPF,
11 and this went to approximately April 1979, I worked on the
12 house continually through that period. Then I was able to
13 get out of the RPF, and I continued on working on the house,
14 and we were working day and night at that point in order to
15 make it ready for him.

16 We were expecting him to arrive at the end of
17 April. He never did, in fact, arrive to reside in the house
18 because again the cover for the property was blown; and as a
19 result, sometime later he went into hiding completely, but
20 he did arrive a number of times later in 1979.

21 We had, by the summer of '79, the house was --
22 even earlier, probably by May, it was habitable and had been
23 fully renovated, but he never came other than the
24 occasional time.

25 There was about a week period when he arrived
26 on a daily basis or actually at night, and he came to the
27 house and then went to -- there was a small studio which had
28 been established in a reservoir, an underground reservoir on

23.4

1 the property, and he came and conducted some still photo-
2 graphy at that time. He came another several times
3 throughout that year, principally to meet with Mary Sue.

4 Q Now, during that period of time, did you
5 receive orders from the Commodore's Messengers that this
6 house was being readied for L. Ron Hubbard?

7 A Yes.

8 Q And, to your knowledge, where did all the
9 funds come from to do all those renovations?

10 A I -- they came from the same place that all
11 other funds came from.

12 Q And where was that?

13 A That was from something called SEA ORG
14 Reserves.

15 Q And in April 1979, did you have a title in
16 connection with your duties involving the house renovation?

17 A To begin with, I was the LRH renovation
18 purchaser, and this was for a couple of months after
19 getting out of RPF.

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1 Then I became LRH's renovations in charge. And
2 I continued on that post up until the end of 1979.

3 Q Now, LRH stands for L. Ron Hubbard?

4 A Yes.

5 Q Was there a term used at that time called "The
6 Household Unit"?

7 A Yes.

8 Q And what was that -- what did that term apply
9 to?

10 A The Household Unit contained the personnel who
11 worked for L. Ron Hubbard directly taking care of personal
12 household needs; that is as opposed to the personal office
13 personnel who took care of needs outside the household, his
14 accountant, so on.

15 The Household Unit contained the LRH cook; LRH
16 steward; LRH driver. I was the LRH renovations in charge.
17 And I was the deputy commanding officer of the Household
18 Unit on the Gilman Hot Springs property. And it contained
19 the COHU, the Commanding Officer of the Household Unit.

20 Q Who was that?

21 A Up until the beginning of 1980, that was Kima
22 Douglas.

23 Q Did you get paid while you were the LRH
24 renovations in charge in the Household Unit?

25 A Yes.

26 Q And who did you get paid by?

27 A Either -- I believe Gary Press was the person at
28 that point who was taking care of disbursements for the CMO

1 Personal Office staff.

2 Q Were you paid in cash?

3 A Yes.

4 Q Did you receive wage vouchers?

5 A Yes.

6 Q Were they blank?

7 A Yes.

8 THE COURT: We'll take a recess at this time. We'll
9 reconvene at 1:30

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11 (At 11:58 a.m. a recess was taken
12 until 1:30 p.m. of the same day.)
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1 LOS ANGELES, CALIFORNIA; THURSDAY, MAY 10, 1984; 1:32 P.M.

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4 THE COURT: Very well. In the case on trial, let the
5 record reflect that counsel are present.

6
7 GERALD ARMSTRONG,
8 resumed the stand and testified further as follows:

9 THE COURT: The witness has retaken the stand.

10 Just state your name again for the record, sir.
11 You are still under oath.

12 THE WITNESS: Gerald Armstrong.

13 THE COURT: You may continue, Mr. Flynn.

14 MR. FLYNN: Thank you, Your Honor.

15
16 DIRECT EXAMINATION (Resumed)

17 BY MR. FLYNN:

18 Q Mr. Armstrong, prior to lunch, do you recall
19 your testimony about the period that you were working at the
20 special unit at La Quinta?

21 A Yes.

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1 Q And what was the date again that you were
2 working at the Special Unit at La Quinta?

3 A From December of 1977, December 30, '77 to the
4 beginning of December 1978.

5 Q Do you recall your testimony that Mr. Hubbard's
6 cover was blown at La Quinta which caused a move to Gilman
7 Hot Springs? Do you recall that?

8 A Yes.

9 Q What were the circumstances under which
10 Mr. Hubbard's cover was blown?

11 A There was an elderly couple named the Hartwells
12 from Las Vegas or somewhere in Nevada. And they had been
13 recruited to come out to the La Quinta property and be
14 involved in a shooting of movies. And they were apparently
15 promised various things which were not delivered.

16 They subsequently left the property and went to
17 the press or the authorities and there was -- the cover was
18 blown through this elderly couple, the Hartwells.

19 Q Now, was there a briefing that took place with
20 regard to security at La Quinta during that period of time?

21 A Well, I was briefed when I arrived at the
22 La Quinta property.

23 Q And what was that briefing?

24 MR. HARRIS: And who gave it if he knows, for
25 foundation, Your Honor.

26 Q BY MR. FLYNN: Why don't you describe the
27 circumstances of the briefing, Mr. Armstrong?

28 A There was a briefing pack of materials which

1 laid out what the shore story was for the La Quinta
2 property. And I was briefed and checked out on those -- on
3 those materials in what is called the Qualifications
4 Division, INQUAL, in La Quinta in one of the buildings.
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1 Q Now, were there precautions taken with regard
2 to the service of process on Mr. Hubbard at La Quinta?

3 A Yes.

4 Q And what were those precautions?

5 MR. HARRIS: And how did he know, Your Honor? We are
6 getting into --

7 THE COURT: Well, if you have an objection, counsel,
8 please state it.

9 MR. HARRIS: No foundation and hearsay.

10 THE COURT: If you know, you can state it. If you
11 don't know, you can so state. You, of your own personal
12 knowledge. Counsel may be able to develop it in other ways.

13 We are talking about basically matters that you
14 are capable of responding to of your own personal knowledge.

15 THE WITNESS: All right. I was familiar with the
16 procedure to be followed regarding service of process
17 through two ways.

18 First of all, I was a guard on the property.
19 In addition to the regular duties in connection with shooting
20 the movies, a few times a week for a great deal of that time
21 I had guard duty, and the guard duty -- the guard was
22 stationed on Mr. Hubbard's -- the grounds of his residence;
23 and before assuming guard duty, I was briefed and drilled on
24 how to handle people making inquiries or process servers.

25 But, in addition to that, everyone on the
26 property was briefed at crew briefings, so everyone was
27 briefed on exactly how to handle process servers or anyone
28 like that.

27.2

1 Q BY MR. FLYNN: And how were process servers to
2 be dealt with?

3 A Well, first of all, it was specifically -- if
4 they had asked for anyone, and more particularly Mr. Hubbard,
5 we were to deny that we knew that he was on the property or
6 who he was, and we were not to accept any papers. If they
7 forced them on us, we were to kick them away.

8 Q And were there other precautions taken with
9 regard to Mr. Hubbard's security at that time?

10 A Well, the guard, of which I was one, had a
11 walkie-talkie which had a preset channel which set off an
12 alarm in several locations on the property and several of the
13 buildings.

14 Additionally, if anything -- if we were
15 approached by anyone, we were to first of all push the alarm
16 button on the walkie-talkie and alert the CMO member on duty.
17 There was always a messenger on duty in Mr. Hubbard's house
18 24 hours a day, and we were to alert them. There was a car
19 kept back of Mr. Hubbard's house which was to be used as a
20 getaway vehicle, and we were to keep whoever it was outside
21 the property until such getaway could be made.

22 Q Now, and you were actually personally guarding
23 L. Ron Hubbard; is that correct?

24 A That is correct.

25 Q And you were being paid at that time in cash
26 with blank wage vouchers?

27 A Yes.

28 Q And I believe you testified this morning that

27.3

1 Mr. Hubbard dictated all the details of your work at the
2 Special Unit at La Quinta?

3 A Yes.

4 Q And what again was the cover story at La Quinta?
5 What was the nature of the organization you were supposedly
6 working for?

7 A Well, we were all to be friends of Norton
8 Karno. Norton Karno, it turned out, was Hubbard's tax
9 attorney.

10 Q Now, was there shredding or vetting or burning
11 of documents at La Quinta that you participated in?

12 A Yes.

13 Q And what did that involve?

14 A There was a couple of times in 1978 while I
15 was on the property that we vetted or shredded materials
16 which at that time showed either a connection to the
17 Guardian's Office, connection to Mary Sue Hubbard or
18 Hubbard's control of Scientology. Those were the criteria
19 set down for vetting of materials.

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1 Q Were you briefed on what --

2 What is "vetting"?

3 A Vetting is the examination of any document and
4 the cutting out of the portion which, in this case, linked
5 Hubbard in, for example, if he ordered a particular thing
6 and there was an "LR" at the bottom, then the "R" could be
7 cut out and then no one would know who in fact had ordered
8 it.

9 Q You testified earlier this morning about
10 messengers. And you referred to exhibit K with regard to
11 the policies of messengers following Mr. Hubbard's orders;
12 were logs kept of those orders, the oral orders to
13 messengers?

14 A As long as I knew -- and this goes back to the
15 beginning of 1971 -- every order that he ever gave was kept
16 in a messenger log.

17 Q When did you last see any of those messenger
18 logs?

19 A 1978.

20 Q And where did you see them?

21 A They are kept in the Messenger Office over at --
22 in the same residence in which Mr. Hubbard lived in 1978.

23 Q Do you have any knowledge of the fact that those
24 messenger logs were subsequently buried in concrete bunkers
25 anywhere?

26 A No personal knowledge.

27 Q Now, were you given briefing or briefings on
28 what vetting is?

1 A Yes.

2 Q And you have just testified about what vetting
3 is; is that correct?

4 A Yes.

5 MR. FLYNN: Your Honor, may this be marked next in
6 order?

7 THE COURT: It will be marked W.

8 Q BY MR. FLYNN: Would you examine exhibit W,
9 Mr. Armstrong?

10 Does that generally relate to the policies in
11 which you were briefed on vetting?

12 MR. HARRIS: Objection, Your Honor. Vague.

13 If he saw this before and he can lay a
14 foundation for it, that is something else.

15 THE COURT: You may proceed in that fashion, counsel.

16 Q BY MR. FLYNN: Have you seen this particular
17 vetting policy, Mr. Armstrong?

18 A Not while in the organization.

19 Q Did you see a vetting policy similar to that?

20 A Yes.

21 Q In what way did the two differ?

22 A This is more extensive. It is longer.

23 The other one was on a single sheet of paper.

24 The instructions on the other one dealt mainly
25 with L. Ron Hubbard and connections to the Guardian's Office.
26 The mentions of the criminal activities were not made in the
27 vetting write-up which I saw.

28 Q At a later point in time did you see this

1 vetting write-up that has been marked as exhibit W?

2 A Yes.

3 Q When was that?

4 A It would have been some months ago.

5 You showed it to me.

6 Q Now, when you were doing the vetting at the
7 Special Unit did you follow the procedure outlined in that
8 policy?

9 THE COURT: Which policy?

10 Q BY MR. FLYNN: As set forth in exhibit W, of
11 using a razor blade to vet out information from documents?

12 A That is correct.

13 MR. LITT: Your Honor, we won't belabor it, but we
14 believe that all of this is irrelevant and is improper.

15 MR. FLYNN: I'll tie it all in, Your Honor.

16 THE COURT: All right.

17 Q BY MR. FLYNN: You testified this morning that
18 after your duties at the Special Unit which you have
19 described, Mr. Hubbard ordered you to the RPF; is that
20 correct?

21 A Yes. That was during my time in La Quinta.

22 Q And during that period of time were you ordered
23 to undergo security checks?

24 A Yes.

25 Q What is a security check, Mr. Armstrong?

26 A In a security check a person undergoing the
27 security check is made to hold onto the two electrodes of a
28 small device which is similar or operates the same as a lie

1 detector. And he is interrogated on various subjects and
2 must answer the questions until the appropriate read is
3 obtained on the device called the E-meter.

4 MR. HARRIS: Your Honor, I move to strike unless the
5 witness' expertise in the operation of a polygraph is
6 established.

7 MR. FLYNN: Your Honor --

8 THE COURT: The witness said similar. I'll overrule
9 the objection.

10 Some of these cases that have been submitted to
11 me and the in-limine motions dealt with an E-meter. So I
12 have some awareness of what has been written up in judicial
13 opinions, for whatever it is worth.

14 MR. FLYNN: Your Honor, may this be marked as next in
15 order?

16 THE COURT: Exhibit X.

17 Q BY MR. FLYNN: when you were working for
18 Mr. Hubbard did you read and were you trained with respect
19 to policies on security checks?

20 A Yes.

21 Q And does the exhibit that is now in front of you
22 constitute the policy that you read and were trained on with
23 respect to security checks?

24 A This is one of many.

25 Q And with respect to your testimony that the
26 device that you described was used as a lie detector, does
27 it so state in that policy?

28 A Yes.

1 Q And were you generally interrogated in a
2 security check about your intentions or attitudes toward
3 Mary Sue Hubbard and L. Ron Hubbard?

4 A Many times.

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1 Q How many security checks did you undergo while
2 you were working for Mr. Hubbard?

3 A Hundreds.

4 Q Now after the period that you were in the
5 rehabilitation project, you testified this morning that you
6 went to the Gilman Hot Springs property and became the
7 L. Ron Hubbard renovations in charge of the household unit;
8 do you recall that?

9 A yes.

10 Q What was the cover story with regard to the
11 activities that were being conducted at the Gilman Hot Springs
12 property?

13 A There were a number of cover stories through a
14 period of time.

15 Q And what were they?

16 A The first one was that we were members of the
17 Scottish Highland Quietude Club -- excuse me for laughing.

18 The next one was we were Friends of Richard Hoag.

19 Q And you held yourselves out to the public as
20 being members of the Scottish Highland Quietude Club?

21 A Yes, that was very brief, and then we became
22 Western States Scientific Communications Association.

23 Q And were you ^{drilled} ~~thrilled~~ to hold yourselves out as
24 such to people outside the property that you were working
25 on?

26 A Yes.

27 Q Now in January of 1980 did you receive a
28 briefing with regard to a potential government raid on the

29-2

1 property at Gilman Hot Springs?

2 A Yes.

3 Q And what was that briefing?

4 A That such a raid may happen and that we were
5 having an all-hands vetting and shredding project.

6 Q Was that briefing done orally or were you given
7 written instructions?

8 A We had a small note of criteria on which to
9 base the shredding, and we were briefed orally.

10 Q And what was the criteria?

11 A Anything which connected L. Ron Hubbard to
12 the Gilman or La Quinta properties; anything which showed any
13 connection to the Guardian's office; anything which showed
14 Hubbard's control of Scientology or Scientology finances;
15 anything which showed any orders being written by Hubbard
16 into the Scientology organizations.

17 Q Who did you receive that briefing from?

18 A It was from one of the messengers.

19 Q Do you recall which messenger?

20 A I believe it was Shelley Miscavige -- Shelley
21 Barnett.

22 Q Barnett was her maiden name?

23 A Yes.

24 Q And did you in turn give a briefing to the
25 people who were working for you?

26 A Yes.

27 Q And how many people were working for you at the
28 time?

29-3

1 A About six.

2 Q And what generally were their duties?

3 A Each person was to go through his or her
4 respective areas and all documents, all papers in their
5 respective areas and vet or shred.

6 At this point almost everyone involved had
7 done this process before, had gone through and vetted
8 materials in their area.

9 The degree of security had been stepped up so
10 that materials which had previously been vetted; that is, a
11 little section cut out with a razor blade were not be shredded
12 unless they were absolutely essential, so it required that
13 even materials which had been gone through before be now
14 re-evaluated and this time shredded. It was a massive
15 shredding with a much higher degree of security than
16 previously, so I briefed each one of my people, all together
17 actually on what the situation is and on what to look for and
18 what to do.

19 Q Now these five or six people, what were their
20 duties in the household unit?

21 A I had Don something-or-other who was the
22 carpenter, and he was the LRH carpenter.

23 I had Paco Suarez who was the LRH steward.

24 I had Brenda Black. Her title was the LRH gear
25 in charge.

26 Q What did that mean?

27 A She was in charge of all of Mr. Hubbard's
28 materials which were stored on the Gilman Hot Springs property,

29-4

1 and there was someone -- Lucy something-or-other, who was in
2 charge of LRH grounds and animals.

3 Q And all of these people worked for -- strike
4 that.

5 All of these people had duties in which they
6 were working in connection with activities for L. Ron Hubbard
7 personally?

8 MR. LITT: Objection; leading.

9 THE COURT: If you know, you can answer. Overruled.

10 THE WITNESS: Yes they were.

11 Q BY MR. FLYNN: At that time, Mr. Armstrong,
12 what were you being paid per week?

13 A My recollection \$20.

14 Q And how many hours a week were you working?

15 A Probably a hundred.

16 Q Were you being paid in cash?

17 A Yes.

18 Q And what if anything was stated on the wage
19 vouchers that were given to you when you were paid?

20 A Nothing other than my name.

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1 Q Approximately how many people at the Gilman
2 Hot Springs -- strike that.

3 What was the Gilman Hot Springs property called?
4 Did it have a code name?

5 A It was called SU or some of us called it
6 SHQ.

7 Q Now, approximately how many people at the SU --
8 is that Special Unit?

9 A Yes.

10 Q Approximately how many people at the Special
11 Unit were involved in the shredding and vetting operation
12 in January, 1980?

13 A Virtually everyone on the property. And that
14 would probably be in excess of 200 people at the time.

15 Q Where did you obtain shredding equipment?

16 A The shredding equipment was rented. It was a
17 very big industrial shredder. And it was rented by a man
18 Sheldon Maysel and brought on to the property by him.

19 Q When you say "a large industrial shredder,"
20 can you give us an idea as to its dimensions?

21 A Yes. The -- when I call it an industrial
22 shredder, we had several shredders on the property. It was
23 always procedure to shred things. But the smaller shredders
24 which we had could not handle that kind of volume.

25 this could take in like a quarter of an inch
26 of paper at one time. It was a massive shredder. It was
27 probably three feet square. But the important factor was the
28 amount of -- the motor power, the jaw size.

30-2

1 Q And how were documents brought to the shredder?

2 A In boxes, en masse.

3 Q And how were the shredded pieces of paper
4 removed from the shredding area?

5 A They were packed up and trucked off the
6 property.

7 Q And how big were the trucks?

8 A I believe they are called five ton trucks.

9 Q How long did the shredding operations go on.

10 A At least two weeks.

11 Q And do you have an estimate as to the volume
12 of paper that was shredded?

13 A A million pages.

14 Q In connection with the duties that you and
15 your staff had to shred, what did you do?

16 A The materials which I went through personally
17 had to do with Hubbard's orders regarding the Gilman Hot
18 Springs property.

19 I shredded any order from him regarding work
20 to be done on the property and then anything in which
21 financial records, I cut out any reference to him.

22 I oversaw the work which was being done by all
23 my juniors.

24 Q Now, Brenda Black was one of your juniors?

25 A Right.

26 Q What were her duties in the shredding operation?

27 A She had exactly the same orders; she was to go
28 through the LRH storage area.

30-3

1 Q Where was that located?

2 A Principally in the top floor of a condemned
3 hotel on the property.

4 Q What was the hotel called?

5 A Del Sol.

6 Q Did you instruct her to do that?

7 A Yes.

8 Q Were you generally aware of what was kept on
9 the top floor of the Del Sol Hotel?

10 A Generally, yes.

11 Q What was your understanding?

12 A That it was Mr. Hubbard's personal materials,
13 anything which he owned.

14 Q And at some point in time did Brenda Black come
15 to you with materials that she had retrieved from the top floor
16 of the Del Sol?

17 A Yes.

18 Q When was that?

19 A It was during the same time period. It was one
20 of the first nights of the vetting operation.

21 Q And would you describe what occurred at the time
22 she came to you?

23 A She came to me; I was in the carpenter shop
24 which is where my office was. And she brought in an old box
25 and she asks, she said she had found these things and she
26 wondered whether or not they should be shredded.

27 Q Now, under the criteria that had been established
28 for shredding, should they have been shredded?

30-4

1 A Yes.

2 Q And what decision did you make?

3 A I evaluated that materials which I looked at
4 that point predated Dianetics. And I thought that there
5 could be no reason why the FBI or whoever was going to raid
6 the property could tie Hubbard in via these documents. So --

7 Q What connection did they have to Hubbard?

8 A Well, the fact they were obviously identifiable
9 as his and they would have identified the fact that his
10 materials were being stored at the property; thus indicating
11 a control.

12 No one else on the property had a whole top
13 floor of the hotel dedicated to their personal belongings.

14 Q So one of the criteria for shredding, namely,
15 the location of property that was connected to Hubbard which
16 was stored at Gilman Hot Springs; under that criteria this box
17 of materials should have been shredded; is that right?

18 MR. LITT: Objection. Leading.

19 THE COURT: He already testified to it.

20 Q BY MR. FLYNN: Under the other criteria you
21 deemed that they predated Dianetics; is that correct?

22 A Right. I made the independent judgment at that
23 point that I recognized the historical value and I saved
24 them for that reason.

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31-1

1 Q What did you do with this box?

2 A Well first I questioned Brenda Black as to
3 where she got it. She actually told me right away where it
4 had come from, first from the garage and then up to Del Sol
5 and then going through the materials she discovered it.

6 So I asked her if there was anything more.
7 My recollection is she wasn't sure at the time, but she had
8 already located one other thing and that was a trunk of
9 materials relating to the death of Quentin Hubbard, and I
10 went with her at that time and looked at those materials
11 concerning the death of Quentin Hubbard, and then I took the
12 one box over to one of the buildings on the property, the
13 Massacre Canyon Inn where the L. Ron Hubbard PR Bureau had
14 an office, the reason I did that was because I saw historical
15 value. The materials I saw related to a small diary from
16 the period when Mr. Hubbard was in China, and I thought at
17 that time that here was the proof of these things and that
18 they had value, and that I already was familiar with Laurel
19 Sullivan because we had been very close prior to that. I had
20 been her junior, and I knew at that point of the biography
21 project and I thought that they would have present value for
22 the biography. So I determined to send them to her.

23 Q Now, at that point in time was it your decision
24 not to shred the materials?

25 A Yes.

26 Q What else -- what were the contents of the box
27 other than the China diary that you described?

28 A There were a number of personal letters, principally

11-2

1 between Mr. Hubbard and his first wife. There was a book of
2 handwritten short stories or outlines for stories which
3 appeared to be from Mr. Hubbard's youth.

4 Those are principally what I recall at this
5 time.

6 Q Now, the L. Ron Hubbard China diary, is that
7 currently under seal?

8 A Yes.

9 Q How long of a period of time does the diary
10 cover?

11 A Just a couple of weeks.

12 Q And was Mr. Hubbard in the Boy Scouts at the
13 time -- strike that.

14 Was it part of a YMCA trip to China?

15 A Yes.

16 Q And how long did the trip last according to
17 the diary?

18 Q I recall a couple of weeks. It was only --
19 in China itself it was simply a train ride into China and a
20 visit of the Great Wall and a visit to Peking.

21 Q Now you brought the materials to Laurel Sullivan
22 and what did she do with them if you know?

23 A She had one of the girls who worked for her
24 by the name of Share Karl photocopy them and then they were
25 put into plastic bags and they were then given to a messenger
26 by the name of Karen Clavel, and they were kept under
27 Karen Clavel's bed, the reason being it was still deemed that
28 the FBI could come in and take these documents.

31-3

1 Q Now in addition to the historical value that
2 you have testified about, at that time when you prevented
3 the documents from going to the shredder, did you see any
4 other value in them?

5 A Well, that was principally it. Their value in
6 the creation of a biography was what I immediately saw. There
7 was collective value in addition to that. I was aware to some
8 degree that people were collecting up L. Ron Hubbard memo-
9 rabilia and that such a set of documents would have value.

10 Q Now in connection with the value to the
11 biography project, did you determine that there was value in
12 the truth that could be found in the contents of the documents?

13 A Well, I assumed at that point that with the
14 documents that I found and the documents that I found over
15 the next few days they would be able to put to rest the
16 allegations which had been made in various of the media
17 regarding Hubbard's past. I felt like here we had the
18 documentary proof.

19 Q And at that point in time did you read through
20 very carefully all of the contents of these documents that
21 were in the box and in the trunk?

22 A No.

23 Q You just skimmed them?

24 A I only ascertained what they were, the fact that
25 they were his, and never really got into the contents at
26 that point.

27 Q Now, in your mind at that time, Mr. Armstrong,
28 what was their primary value?

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A I think in being able to document the truth of the man and to create the foundation for a biography.

Q And after you collected the documents and gave them to Laurel Sullivan, did you then send a petition to Mr. Hubbard?

A Yes.

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1 MR. FLYNN: For the record, Your Honor, this has been
2 marked as exhibit F, I believe.

3 THE COURT: All right. Exhibit F.

4 Q BY MR. FLYNN: Do you know what Laurel Sullivan
5 did with the copies of the -- that she made from the contents
6 of the box from the trunk of the van what was buried or --
7 strike that -- other than what was placed under the bed of the
8 messenger?

9 A I was told at the time by Laurel that they were
10 going to go to the PR Bureau in Clearwater and to the PERS SEC
11 WW in the United Kingdom.

12 MR. LITT: I move to strike on the ground of hearsay,
13 Your Honor.

14 THE COURT: It is evidence of what was told to him,
15 his personal state of mind at that time.

16 Q BY MR. FLYNN: Do you recall the date of your
17 petition, Mr. Armstrong?

18 A Yes.

19 Q And when was the date?

20 A 8 January, 1980.

21 Q And at the time of the petition what essentially
22 were you petitioning for?

23 A To be able to collect up all the records, files
24 of Mr. Hubbard; to assemble them and to do the research for
25 his biography.

26 Q And did you feel that it related to the success
27 of various of Mr. Hubbard's personal undertakings?

28 A Yes.

32-2

1 Q And did you put that in your petition?

2 A Yes.

3 Q And did you feel that it related to the success
4 of the Nobel Prize project?

5 A Yes.

6 Q What was the Nobel Prize project?

7 A Mr. Hubbard had ordered in the end of 1979
8 that a Nobel Prize be obtained for him for his discovery or
9 creation of the Purification Rundown. It was a series of
10 steps which he felt could eliminate toxins and radio active
11 particles from the body.

12 Q Did you work on that Nobel Prize project?

13 A Yes.

14 Q What did you do?

15 A I did some of the research to find out who the
16 nominating committee was and to see whether or not we could
17 locate anyone in the Scientology network who had a connection
18 into any of the members of the nominating committee.

19 Q And did you petition Mr. Hubbard to collect
20 up the materials for the success of his biography and press
21 legal handling?

22 A Yes.

23 Q And how did you know about the biography at that
24 point in time?

25 A Because I was familiar to some degree with the
26 work that Laurel Sullivan was doing.

27 We had been in RPF together for some months;
28 we had worked together on the LRH renovations project and had

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1 become familiar with the fact that there had been one
2 planned for several years.

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1 Q What did you mean when you wrote Press/legal
2 handlings?

3 A Well, Mr. Hubbard had been the subject of press
4 criticism for a long period of time. I knew about this from--
5 on the ship. I knew about it from Clearwater. I knew about
6 it from La Quinta, and I knew about it from Gilman Hot Springs,
7 and always the story which was told to the people inside the
8 organization was that these were just rumors and lies being
9 created by the media, and I felt that with the documented
10 proof we could put to rest all the entheta or the lies being
11 spread by the media.

12 Q So you felt that you would alleviate threats
13 to Mr. Hubbard?

14 A Yes.

15 Q And you petitioned for that?

16 A Yes.

17 Q And you felt by doing this project, you could
18 insure his free movement and the free movement of his actions
19 and projects and ideas?

20 A Yes.

21 Q Did you petition to do this project to preserve
22 valuable documents relating to L. Ron Hubbard?

23 Was the box that Brenda Black brought to you
24 when you found it exposed to the weather?

25 A Yes.

26 Q And would you describe in general its condition?

27 A It was a very beat up, raggedly cardboard box.

28 Q Now, at the time that you made this petition

??

1 was anyone else collecting personal documents of L. Ron Hubbard
2 if you knew at the time?

3 A I don't know of anyone at the time, not that I
4 recall.

5 Q And in the petition did you tell Mr. Hubbard
6 that you had found his box of personal papers in the Del Sol?

7 A Yes.

8 Q And did you tell him that they were of immeasurable
9 value to a biography?

10 A I believe so.

11 MR. LITT: Objection, Your Honor. The petition speaks
12 for itself.

13 THE COURT: Yes, it does.

14 Q BY MR. FLYNN: Were they Navy documents that
15 you found in the Del Sol, Mr. Armstrong?

16 A I found a great deal of Navy documents there.

17 Q And did the Navy documents pertain to L. Ron
18 Hubbard?

19 A Yes.

20 Q Now when you petitioned, Mr. Hubbard, did
21 you describe what your duties would be in this project?

22 A Yes.

23 Q And what were those duties that you envisioned?

24 MR. LITT: Is that a question as to what is described
25 in the petition?

26 Q BY MR. FLYNN: What were the duties that you
27 petitioned for?

28 A Do you wish me to read them?

1 Q Do you recall what they are?

2 A I think principally, yes.

3 THE COURT: Well, the writing is the best evidence of
4 what his request was.

5 Q BY MR. FLYNN: In any event, you did lay out a
6 whole series of the duties in your petition to Mr. Hubbard?

7 A Yes.

8 Q And what did you do with the petition?

9 A I put it in an out-basket and it went to
10 Mr. Hubbard.

11 Q And did these duties include the fact that you
12 were going to collect documents all over the world relating
13 to L. Ron Hubbard?

14 A I believe so, yes. That was the intention of
15 it.

16 Q Do you know whether it went to Mr. Hubbard?

17 A Yes.

18 Q And how do you know?

19 A I received an answer back from Mr. Hubbard
20 approving my petition.

21 Q Now, during your at this point ten years of
22 involvement of working for Mr. Hubbard, had you become
23 aware of the normal procedures for getting communications to
24 and from Mr. Hubbard?

25 A Yes.

26 Q And what generally were those procedures?

27 A It varied according to the time period, but
28 during this time we had on our property the LRH External

1 Communications Bureau and I knew during this time that
2 Mr. Hubbard was living in Hemet, and I knew of the procedure
3 of mail drops, so I knew that a petition to him during that
4 period could get to him.

5 Q Did you have personal knowledge that he was
6 actually living at Hemet, California on January 8, 1980?

7 A No.

8 Q What knowledge did you have?

9 A I had the knowledge that I received an answer.
10 I received a subsequent answer. I confirmed with the person
11 from whom I -- who typed, whose initials are on the bottom of
12 his response that indeed it came from him and the person
13 told me that yes, --

14 MR. LITT: Objection; this calls for hearsay.

15 THE COURT: Well it is his state of mind.

16 THE WITNESS: Since the initials on the bottom of it
17 are BD, and they stand for Barbara Decelle, and I spoke to
18 Barbara Decelle and she confirmed that he had indeed dictated
19 the communication and that she had received it, the taped
20 message and had typed it into the dispatch which I received.
21 I knew also from working with Laurel.

1 Q BY MR. FLYNN: When had you last seen Mr. Hubbard
2 prior to January 8, 1980?

3 A Sometime in late 1979.

4 Q How did you know that he was living at Hemet?

5 A Because I was in the Household Unit at the time
6 and I was involved in drops and pickups of people,
7 transferring them to the Hemet location.

8 Q What are drops and pickups?

9 A No vehicle would drive straight from the Gilman
10 Hot Springs property to the Hemet address. We would simply
11 arrange a drop and both vehicles would arrive there and then
12 a transfer would be made at that point.

13 Q Were these part of the security precautions
14 taken to prevent Mr. Hubbard from being served with process,
15 if you know?

16 A Yes.

17 Q Who was with him at the Hemet property at the
18 time if you know?

19 A I'm aware of a number of people who were there
20 at the time.

21 Q Who are they?

22 A Mike and Kima Douglas; Lola Russo; Paco
23 Suarez -- all of these are during, at least, part of that
24 time -- Pat Nanenbroker.

25 Q And were there routine and regular
26 communications between Mr. Hubbard in Hemet and the Gilman
27 Hot Springs property where you were located?
28

1 A There were communications. I don't know how
2 regular they were.

3 There was a regular run, a regular traffic run
4 every day.

5 Q Now at some point in time did you receive an
6 answer to this petition?

7 A Yes.

8 Q And do you recall when that was, Mr. Armstrong?

9 A It was just a few days following this.

10 MR. FLYNN: May that be marked next in order, Your
11 Honor?

12 THE COURT: We are up to Y.

13 Is this two pages, or is it one?

14 MR. FLYNN: I'll try to clarify that with the witness,
15 Your Honor.

16 THE COURT: All right.

17 Q BY MR. FLYNN: What did you first receive in
18 response to your petition, Mr. Armstrong?

19 A I received the document which is the very bad
20 copy here.

21 Q What is that document which is the bad copy?

22 A That is Mr. Hubbard's response approving the
23 petition.

24 There is a note on the top saying "Re your
25 petition." There is no date on it that I can see.

26 It appears to be a very bad copy.

27 Q Where did you get this copy?

28 A This was produced by the organization in the

1 course of this case.

2 Q Now, the copy is very difficult to read; do you
3 recall what it said?

4 A I can read it a little bit.

5 (Reading:)

6 "This sounds like an excellent
7 idea. You'll have to be replaced properly, of
8 course. Get with your senior and EC and get
9 this carried out and let me know what you have
10 worked out.

11 "LR."

12 Q Now, what did "LR" signify in your experience?

13 A Love, Ron.

14 Q And had you seen numerous documents in your
15 years of involvement with Mr. Hubbard in which
16 communications came back from him in that manner?

17 A Yes.

18 Q And was it generally accepted by people who
19 worked for Mr. Hubbard that that signified communications
20 from him?

21 A Yes.

22 Q And was that the routine procedure in January
23 1980 with regard to receiving communications from him?

24 MR. FLYNN: Your Honor, maybe that first one should be
25 marked Y and the second one will be marked separately.

26 THE COURT: All right.

27 Q BY MR. FLYNN: Did you receive another
28 communication relating to your petition?

1 A Yes.

2 Q And what was that communication, Mr. Armstrong?

3 A It was another note from Mr. Hubbard. And it is
4 after the petition was approved.

5 I wrote up what is called a non-existent formula
6 in which I asked people with whom I'll have a relationship
7 while I am working on a post or project, I inform them what
8 I am intending to do and ask them what they need and what
9 from me. It is just a means of briefing people on what I
10 was doing.

11 I, in fact, had created a new post with this
12 thing. It had never been done before.

13 And once I had the petition approved by
14 Mr. Hubbard, I sent various of these no-existent formulas or
15 briefings to people, one of whom was Mr. Hubbard. And this
16 is his response.

17 Q So the collection of Mr. Hubbard's personal
18 documents originated for the first time with you on a new
19 post approved by him; is that correct?

20 A Yes.

21 MR. LITT: Objection. Leading, Your Honor.

22 THE COURT: I'll let the answer stand.

23 Q BY MR. FLYNN: Would you look on the routing of
24 the document dated February 8, 1980 --

25 Exhibit Z, Your Honor?

26 THE COURT: All right; Z.

27 Q BY MR. FLYNN: -- and describe to the court what
28 that routing means.

1 A The top left corner is the name "Senior TRO
2 Researcher." That was a post title which I developed so
3 that it was recognizable and correspondence could be sent to
4 and from me via organization communications lines; all the
5 CCs refer to posts of individuals who receive copies of
6 Mr. Hubbard's answer. The "F" at the bottom is simply "to
7 file." That is Mr. Hubbard's file.

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1 Q Now, in your experience with Mr. Hubbard and
2 the Church of Scientology, were any of those posts church
3 posts?

4 A Each one of these people is a person who worked
5 directly for Mr. Hubbard.

6 MR. LITT: Objection; nonresponsive.

7 THE COURT: All right. I will strike it as nonresponsive.

8 If you know, are they church posts?

9 Q BY MR. FLYNN: In your experience --

10 THE COURT: Let's get an answer, or you withdraw it?

11 MR. FLYNN: I will get to it.

12 Q In your ten years of experience at this point
13 with Mr. Hubbard in Scientology organizations, was a dis-
14 tinction made between working for Mr. Hubbard and working for
15 the Church of Scientology?

16 A Not really, but at a certain level, as I
17 explained before, there was degrees of working for
18 Mr. Hubbard, and I was probably in the ultimate degree at this
19 point. Each one of these people answered only to Mr. Hubbard.
20 They didn't even know about Church of Scientology of
21 California.

22 MR. HARRIS: Is this witness purporting to state what
23 was in the minds of the others, that they didn't know about
24 the Church of Scientology, Your Honor?

25 THE COURT: You want to read the last question and
26 answer.

27 (The record was read.)

28 THE COURT: I will strike the latter portion unless

35.2

1 there is some foundation shown.

2 Q BY MR. FLYNN: What is the basis of your
3 understanding, Mr. Armstrong, that you were working for
4 L. Ron Hubbard in January of 1980?

5 A Well, to begin with, I had been working for
6 him for the last nine years, and I was in the -- at the point
7 I wrote the petition, I was in the household unit and was
8 working only for him. I worked on his house. I took care of
9 his animals, his grounds, his offices. I had no communi-
10 cation whatsoever with the Church of Scientology of
11 California.

12 He was the only one that I answered to, so
13 then when I petitioned, I petitioned him to take possession
14 of his archives and work on his biography, in his PR office,
15 in his personal office.

16 Those were the bases that were in my mind,
17 although it never was a question at that time. It was just
18 obvious to me.

19 Q And at that time were you performing personal
20 services for L. Ron Hubbard?

21 A Yes.

22 Q When you were performing these personal
23 services for L. Ron Hubbard, were you engaged in any type of
24 ecclesiastical or religious activity for the Church of
25 Scientology of California?

26 MR. LITT: Objection; that calls for a conclusion, or
27 are we asking him his opinion?

28 THE COURT: Well, I will overrule the objection.

35.3

1 THE WITNESS: No.

2 Q BY MR. FLYNN: Now, the initial appears in the
3 lower left-hand corner of Exhibit Y, capital R, and then a
4 colon, small bd.

5 What does the R signify?

6 A Ron, and L. Ron Hubbard.

7 Q What does the bd signify?

8 A Barbara Decelle.

9 Q And who was she?

10 A She was at that time the LRH personal secretary
11 on the Gilman Hot Springs property.

12 Q Now, you mentioned a document involving a non-
13 existence formula; is that correct?

14 A Yes.

15 MR. FLYNN: For the record, Your Honor, I believe
16 that's been already marked as Exhibit E.

17 THE WITNESS: No, I believe that is a separate one
18 that I sent to Mary Sue Hubbard.

19 Q BY MR. FLYNN: Okay. Well, let me ask you this:

20 Do you have a copy of the document that you
21 previously described in your testimony as to nonexistence
22 formula?

23 A No.

24 Q Do you know where it is?

25 A It was left in the organization when I left.

26 THE COURT: What is the significance of the words
27 "nonexistence post"? Where did you get that?

28 THE WITNESS: Your Honor, within Scientology there

35.4

1 are various conditions relative to a post or something that
2 one goes up, and nonexistence is at the bottom. I was non-
3 existent at the time that I wrote it. No one knew of the
4 existence of such a post. It was a brand new thing, so I
5 wrote a briefing to each person involved laying out what
6 function I was going to be performing. Hence, I, in that
7 way, get out of nonexistence with those people.

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1 Q BY MR. FLYNN: You left the -- strike that.
2 What was this other document? Was it just a
3 description of what you just told the court?

4 A More or less.

5 In the meantime, a number of things had happened
6 between the point that I had written the petition and the
7 point I wrote the non-existence briefing.

8 I had by that time obtained possession of a
9 great number of the documents from Del Sol. So in addition
10 to the first one or two boxes, I now had about 16 of them.

11 Q 16 boxes?

12 A Right; which I had gone through roughly and laid
13 out in my communication to Mr. Hubbard what they were.

14 I had also transferred -- by that time I had
15 turned over all my records and finances connected with the
16 LRH renovations post and I had moved over and was then
17 working as the Senior PERS PRO researcher.

18 Q How many pages was this document, Mr. Armstrong?

19 A My recollection, it was three pages.

20 Q And its purpose was to inform other individuals
21 of the creation of the new post?

22 A Well, the one I sent to Mr. Hubbard was
23 different from the one I sent to Mrs. Hubbard, a copy of
24 which has been made available to the court. It was a
25 broader description of what I had found up to that point.

26 Q And why did you send a broader description to
27 Mr. Hubbard and a less-broad description to Mrs. Hubbard?

28 A Well, it was Mr. Hubbard's biography that was

1 being done and Mr. Hubbard's records which were being
2 located and assembled in the PR Bureau.

3 Q Was it your state of mind at the time that these
4 were more personal and confidential to him?

5 A Well, perhaps that was a part of it. They were
6 his.

7 If some of them by that point had been noted as
8 Mrs. Hubbard's, it was very few. But it was his biography
9 that was being done.

10 Q Did you send the petition to -- strike that --
11 the non-existence formula to Mrs. Hubbard as a matter of
12 protocol?

13 A No. I actually -- I attached to the one I sent
14 to her, my recollection, a copy of the one I had sent to
15 him.

16 It wasn't protocol so much, but the fact that
17 Mary Sue Hubbard, who had been the man's wife, was obviously
18 going to play a part in the biography. I wanted to alert
19 her to what was being done and to --

20 I requested of her in my non-existent briefing
21 any information on herself which she cared to pass on at
22 that time. That was principally --

23 I sent these briefings to dozens of people on
24 various posts internationally, asking each one of them to
25 send me whatever they had.

26 Q Did you get responses from these people?

27 A Yes.

28 Q And what responses did you get?

1 A Well, from Mary Sue, I received a copy of a
2 history of Mary Sue. This was provided by her secretary,
3 Nikki and other people that I communicated with as well;
4 Susan Anderson in the PR Bureau sent me some information. I
5 don't recall any others right now, but various people
6 responded.

7 MR. FLYNN: Your Honor, if this other document exists
8 in the files of the plaintiff or the intervenor, I would
9 request that it be produced. I believe we have tried to get
10 it before and have not been able to do so; namely, the
11 communication to Mr. Hubbard.

12 MR. HARRIS: If we can get a further description of it
13 from Mr. Armstrong.

14 Your Honor, I understood there was one
15 nonexistent formula that is in the court's possession. This
16 is a whole new one.

17 If we could clear it up that there were more
18 than one and the approximate date, we'll certainly look in
19 our files.

20 THE COURT: Can you be more specific as to the date
21 when perhaps this thing was executed?

22 THE WITNESS: It would have been sometime in early
23 February 1980. And it was one which was sent to
24 Mr. Hubbard. My guess is that there were a number of carbon
25 copies. And that is based on the fact that he has carbon
26 copied a lot of people on the return document.

27 I know of the existence of such a thing because
28 on my non-existence formula to Mary Sue, which would be

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around the same date, but it would be a few days prior to that, I mentioned in that document that I had sent one to Mr. Hubbard.

37.1

1 Q And, in fact, that notation is made in the top
2 first sentence on the second page of Exhibit E; is that
3 correct, Mr. Armstrong? Namely, that "I have sent my non E
4 formula to R and informed him what I plan to do in the
5 biog."

6 THE COURT: Does that have a specific heading or
7 title or just a letter?

8 THE WITNESS: It would be just like -- it would be
9 something similar to the one sent to Mary Sue in which I
10 wrote, "New post non E formula R biography handling."

11 At that point I said, "Attached is my non-
12 existence formula which I have sent to R and various
13 executives in SU Pac, Flag and the UK."

14 So it was various executives in the Special
15 Unit out in Los Angeles. That is Pac. Flat is Clearwater,
16 and UK. That would be at Saint Hill in the UK, and the top
17 executives in each of those areas. Their files could be
18 checked.

19 The people at Flag would be LRH Personal
20 Communicator, LRH Personal Secretary.

21 At Pac would be LRH Personal Secretary. SU
22 would be all the top SMO Personnel, and the UK would be
23 David Gaiman, Sheila Gaiman, who were the Guardian and
24 Guardian PR.

25 THE COURT: Well, did you ever see any of these
26 copies later on at the Cedars Complex?

27 THE WITNESS: Oh, they were there when I left the
28 organization.

37.2

1 THE COURT: You know where they were physically so
2 you could -- I mean, in what box or series of boxes, what
3 room or whatever?

4 THE WITNESS: Yes, they were in a file cabinet left
5 in the archives area which I believe now has all been moved
6 up to Mr. Vorm. I can't tell you the color of the file
7 cabinet, but it would have been one of the file cabinets,
8 and it would have contained information dealing specifically
9 with the biography. There were various files. There was
10 files to do with Omar Garrison, correspondence between Omar
11 Garrison and various organization personnel; Omar Garrison
12 and Mr. Hubbard, me and Mr. Hubbard, me and Mrs. Hubbard,
13 and a great deal of information relating to the biography
14 project.

15 MR. HARRIS: Your Honor, I have seen within the last
16 week something that is called a "nonexistence formula"
17 written by Mr. Armstrong.

18 However, I am confused because by his testi-
19 mony I understand there to be two such things, and I will
20 produce what I found.

21 THE COURT: Well, produce whatever you found and
22 have Mr. Vorm check further and generally where the witness
23 has indicated, and we will take a 15-minute recess.

24 (Recess.)

25 THE COURT: All right. Let the record show that
26 counsel are present. The witness has retaken the stand.
27 Just state your name again for the record, sir. You are
28 still under oath.

37.3

1 THE WITNESS: Gerald Armstrong.

2 THE COURT: Yes, Mr. Harris?

3 MR. HARRIS: Yes, Your Honor.

4 Though you didn't anticipate that I would be
5 able to obtain it for you over this period of time, in fact,
6 I have. This is the only one I have seen, and I think I
7 have been through about everything there is and I will
8 produce it to Your Honor, and I have given a copy to
9 Mr. Flynn.

10 THE COURT: I don't have any particular need for it
11 unless it is going to be used in the trial. I presume it
12 will be.

13 MR. HARRIS: And I think it is on the defendant's
14 exhibit list, too.

15 Q BY MR. FLYNN: Mr. Armstrong, would you look
16 at what Mr. Harris has referred to that was produced; is
17 that the nonexistence formula that you sent to L. Ron Hubbard
18 that you testified about?

19 A No, it is not.

20 Q What is that?

21 A This was a document from the same time period
22 which was sent to various other people. For Mr. Hubbard
23 there was a different document, more -- a longer document,
24 more detailed than this.

25 MR. FLYNN: May this be marked next in order, Your
26 Honor?

27 THE COURT: Okay. Double-A.

28 Q BY MR. FLYNN: Who did you send this to?

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A This was sent to people from whom I requested information. The principal reason was to obtain sources of either documents or data which would be helpful in the biography for the museum project.

1 Q Now, when you sent communications to
2 Mr. Hubbard, did you use a particular routing formula?

3 A It would have gone via Senior PERS Bureau to
4 messenger on duty to Mr. Hubbard.

5 Q Now, let me show you the routing formula on your
6 petition; would you describe to the court what that routing
7 is? What does the "R" stand for?

8 A That is L. Ron Hubbard.

9 Q And then there is under that a "M on D." What
10 is that?

11 A It is "messenger on duty."

12 Q And then your name?

13 A Yes.

14 Q When you sent the non-existence formular you
15 described to L. Ron Hubbard did you use the same routing?

16 A To my recollection, I would have put via the
17 Senios PERS PRO Laurel Sullivan.

18 Q Does that mean you would have just included her
19 in the routing process?

20 A Right. And I would have used the designation at
21 this point, Senior R PERS Bureau Researcher. And I wouldn't
22 have just used the name Gerry Armstrong.

23 Q When was that?

24 A This would have been in early February 1980.

25 Q What was the purpose of your sending the non-
26 existence formular to Mary Sue Hubbard?

27 A To brief her on the fact that the biography
28 project was being done; that I had located these materials;

1 that as a result of locating them, we could now proceed with
2 the biography and to elicit from her any information on
3 herself in that she was going to be a -- obviously, a player
4 in the biography; that is, in the book, the substance of the
5 book because she was married to the subject.

6 Q After having secured approval of the project
7 from L. Ron Hubbard did you need any approval of any nature
8 or description from Mary Sue Hubbard in order to proceed
9 with the project and collect documents?

10 A No.

11 Q And when you wrote to her in connection with the
12 non-existence formula did you specifically ask her for her
13 input into the project?

14 MR. LITT: Objection. The document speaks for itself.

15 THE COURT: If you want to highlight something in
16 particular, you may do so. But the letter does speak for
17 itself.

18 Q BY MR. FLYNN: Is there anything in the document
19 which has been marked as 5 February 19780 Non-Existence
20 Formula, exhibit E, in which you specifically elicited a
21 particular type of response from Mary Sue Hubbard?

22 A The majority of the letter is actually concerned
23 with that.

24 But I do ask specifically:

25 ". . .to facilitate immediate
26 data-gathering do you have any biographical
27 data on yourself which you could send me?

28 Genealogy, I think, could be very useful, any

1 data, actually, on any facet of your life, on
2 Ron, the children, family anecdotes, the
3 formative years of Scientology, facts,
4 expansion, et cetera, which you wouldn't mind
5 having known would be wonderful."

6 Q Is that on page 2?

7 A Yes.

8 Q So you were specifically requesting from her
9 biographical data on her for the biography; is that correct?

10 A That is correct.

11 Q And did she respond by letter dated February 11,
12 1980 which has been marked as exhibit D?

13 A Yes.

14 Q And did you receive that communication in
15 response?

16 A Yes.

17 Q And did Mrs. Hubbard state in response to you:

18 ". . .as regards my part in the
19 book, you'll have to maintain a line with Nikki
20 so that data may be obtained and checked by
21 me"?

22 MR. LITT: Objection. The document speaks for itself.

23 Q BY MR. FLYNN: when you received that,
24 Mr. Armstrong, did you understand that Mrs. Hubbard, per
25 that communication, had to approve your collection of
26 documents for the biography project?

27 A No.

28 Q What did you understand?

1 A That regarding the biographical information on
2 her, which I requested, she wanted me to get in touch with
3 Nikki, who was her secretary, for the obtaining and her
4 checking of that biographical information.

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39-1

1 A Now in your petition to Mr. Hubbard, your
2 initial petition, why did you put your name, your full name
3 in the upper left-hand corner?

4 A Because I was not petitioning from a post but
5 as an individual, so I never had a post title from which to
6 communicate. I was not petitioning as the LRH renovations
7 in charge, which I was at that time. I was petitioning as
8 Gerry Armstrong, an individual.

9 Q And at any time during the period that you were
10 collecting these documents, did you ever understand that you
11 needed Mary Sue Hubbard's permission to collect documents
12 for the biography project?

13 A No.

14 Q Was it ever an issue, Mr. Armstrong?

15 A No.

16 Q Did you, in fact, check with Nikki Merwin to get
17 data on Mary Sue Hubbard?

18 A Yes.

19 Q And what did you do in connection with trying
20 to obtain that data?

21 A I wrote to Nikki and she wrote back and she
22 sent me a biographical piece which she told me had been
23 included in a -- I am not sure of the right name. It was a
24 presentencing report from the criminal case.

25 Q And Nikki Merwin sent you that?

26 A Yes.

27 Q Did she send you any other material?

28 A That was all.

39-2

1 Q When was the next time that you communicated to
2 Mary Sue Hubbard if you presently recall regarding the
3 biography project?

4 A To my recollection there were a few times
5 throughout that period, but there is a couple which stick
6 in my mind. The first was a biography project or program which
7 was written some time in December of 1980, and that was sent
8 to Mary Sue for approval because it was -- she was the senior
9 available person, and there were targets which are steps
10 to be done by people in the Guardian's Office or in the
11 Controller's Office, so she had to approve of this thing
12 because the project itself included Controller's Office and
13 Guardian's Office personnel and targets to be done by these
14 people.

15 Q Who wrote that program up?

16 A Laurel Sullivan and myself.

17 Q How many pages is it?

18 A I believe it is three or four pages.

19 Q And what is it called?

20 A I seem to recall LRH biography project.

21 It is the central office of LRH ED.

22 Q Is it called a COLED?

23 A Yes.

24 Q And what is your best memory as to the date of
25 that COLED?

26 A Some time in the summer of 1980.

27 Q What does the term "COLED" stand for?

28 A Central Office of LRH ED.

39-3

1 Q What does "ED" stand for?

2 A Executive Directive.

3 Q When is the last time you saw that COLED?

4 A Some time in 1981.

5 Q And do you know where it is at the present

6 time?

7 A Inside the organization somewhere.

8 Q Whose name was on it?

9 A I don't recall if it was names. You mean as

10 authors?

11 Q It originated from you and Laurel. Did you

12 both sign it?

13 A Yes, it had both of our -- either our names

14 or our post titles. I believe post titles.

15 Q And who was it routed to?

16 A I don't recall, but there are -- all of the

17 people who had targets received copies. It was a broadly

18 issued document.

19 Q And you know for a fact that that went to

20 Mary Sue Hubbard?

21 A Yes.

22 Q And how do you know that?

23 A Because I know the routing that the originals --

24 CSW it is called, the request was sent on, a description of

25 what was to be done and the reason for doing it. It was

26 stapled on top of the proposed mimeograph.

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1 And that had to be approved before the -- before
2 the thing which was finally published was in fact published.

3 She was on the approval line.

4 Q You mentioned that she was at that time the
5 senior individual to authorize certain types of activities;
6 what did you mean by that, Mr. Armstrong?

7 A Mary Sue Hubbard was the controller; so she was
8 over top of the Guardian's Office. And to -- she would have
9 had to approve orders coming from us which involved
10 Guardian's Officer personnel.

11 Q And why were you seeking to -- what were you
12 seeking to do with Guardian's Office personnel?

13 A Well, utilize the Guardian's Office PR network
14 and for the tours and that sort of thing to do with the
15 promotion of the biography.

16 Q So basically it was a proposal for that purpose,
17 just COLED; is that correct?

18 A It was an approved plan. The proposal was what
19 was attached to the plan which finally got approved and
20 published.

21 Q When you say "published," what do you mean by
22 that?

23 A Within the Scientology network, it was run off
24 in a mimeograph form so that each part of the complete
25 network would be informed of the project and their
26 respective parts in it.

27 Q So they could assist you?

28 A Right.

1 Q And did you actually see an approval from Mary
2 Sue Hubbard of this COLED?

3 A Yes.

4 Q And do you have that?

5 A No.

6 Q When did you last see that?

7 A That would have been at the time it was
8 approved.

9 Q Did Laurel Sullivan see that approval?

10 MR. LITT: I object. That calls for hearsay.

11 Q BY MR. FLYNN: If you know.

12 A I don't know.

13 Q Was she in your presence when the approval came
14 back, if you recall?

15 A No, I don't recall that.

16 Q Laurel Sullivan did participate in the
17 preparation of the COLED; is that correct?

18 A Yes.

19 Q When did you next communicate with Mrs. Hubbard
20 if you can recall relative to the biography project?

21 A I sent her a briefing of what had been done, a
22 lot of archives materials which I was finding, some of the
23 situations which I was finding within the process of
24 checking these things and what I was doing with the
25 biography. And that would have been -- I believe it has
26 already been shown to the court; although I am not sure --
27 sometime in 1980, perhaps August.

28 THE COURT: Where were you stationed now in August,

1 here in Los Angeles, Gilman, or what?

2 THE WITNESS: In Los Angeles.

3 MR. LITT: Is this in reference to the October 15,
4 1980 document?

5 MR. FLYNN: Right.

6 Before I get to that, though, I am going to go
7 through this.

8 Q The document that you just referred to, is that
9 in fact dated 15 October 1980, Mr. Armstrong?

10 A Yes.

11 MR. FLYNN: For the record, that has been marked
12 exhibit J.

13 Q Now, before you sent that did you request any
14 type of an order from the Personal Office of L. Ron Hubbard
15 that you could use to collect documents and information?

16 A Yes.

17 Q And what did you do to solicit such a document,
18 Mr. Armstrong?

19 A Well, at that time I was in Los Angeles. And
20 Pat Brice, who was then the LRH PERS SEC, she was called;
21 was also in Los Angeles. And I requested of her at that
22 time, which was just at the time I was planning a trip up to
23 Washington state and Oregon, to locate some of the places
24 where Mr. Hubbard had lived in his pre-Dianetics days and to
25 interview some of his family members who were still living
26 and who lived in that area.

27 It was for that purpose and to give me entry
28 with Mr. Hubbard's family that I requested this of

1 Miss Brice.

2 MR. FLYNN: May that be marked as the next in order,
3 Your Honor?

4 THE COURT: All right. Double B.

5 Q BY MR. FLYNN: In connection with your request
6 to receive exhibit BB, did you actually send a written
7 communication soliciting exhibit BB?

8 A I don't recall if I did or not. I may have.
9 I spoke to her a number of times.

10 There was a situation at the time I actually
11 wanted such a letter from Mr. Hubbard because that would
12 have been the obvious thing for gaining an entrance in to
13 see the family.

14 She was afraid of obtaining something from
15 Mr. Hubbard because of the attempts at that point to have
16 him served by use of the fact, the claim that he was getting
17 his mail. If he were to sign such a document at that time,
18 it would show that he knew what was going on. And --

19 MR. LITT: Objection. This is all hearsay, I gather.
20 I assume he is reciting what is purportedly a conversation.

21 THE COURT: I am not sure. Maybe you can clarify it,
22 Mr. Flynn.

23 Q BY MR. FLYNN: Was this the understanding inside
24 the Personal Office of L. Ron Hubbard in regard to whether
25 he could sign documents that could go out to the public?

26 A Right. This is what I got. I knew it to be the
27 case. And it was the reason I ended up with this type of
28 document from the SEC rather than one coming from

1 Mr. Hubbard.

2 MR. LITT: I'll make the same objection, Your Honor.
3 I don't know whether he is speaking of some collective
4 knowledge, his personal knowledge, or if it is purportedly
5 of his personal knowledge what the foundation of that
6 knowledge is.

7 He is making assertions about what he knew.

8 THE COURT: I'll let it stand.

9 Apparently he obtained this from Miss Pat
10 Brice.

11 Proceed.

12 Q BY MR. FLYNN: Mr. Armstrong, did you have the
13 original of exhibit BB in your possession at some time?

14 A Yes.

15 Q Do you know where it is now?

16 A It was left in the organization.

17 Q And was the original actually signed by Pat
18 Brice?

19 A Yes.

20 Q And on the copy that we have, it is a poor copy.
21 And you can barely make out the signature; is that correct?

22 A Yes.

23 Q Now, you testified that the next communication
24 you sent to Mrs. Hubbard was on 15 October 1980; is that
25 correct?

26 A Yes.

27 Q Now, let me show you what has been marked as
28 exhibit J.

1 Do you recognize that as the communication that
2 you sent to her?

3 A Yes.
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1 Q How did you route it to her at the time?

2 A From me. I was the senior Pers Pro Researcher.
3 I sent it via senior Pers Bureau who was Laurel, and via
4 Controller Communicator who was Nikki Merwin to the Controller
5 was Mary Sue Hubbard.

6 Q What was the purpose of your sending Mrs. Hubbard
7 exhibit J?

8 A Laurel asked that I send Mary Sue a briefing
9 on what was being done and Laurel expressed to me that in
10 that Mr. Hubbard wasn't around, it was good to keep
11 Mrs. Hubbard briefed. She was very interested in the
12 materials which I have been locating and she had been
13 enthusiastic about the fact that I had located materials
14 which Mr. Hubbard had thought had been stolen in 1953, and
15 Laurel said Mary Sue was very happy about that and she wanted
16 me to just lay out a briefing of my activities and the
17 success I was having at the time.

18 MR. LITT: I assume this is introduced for the background
19 of this communication and not for what Miss Sullivan purportedly
20 said?

21 THE COURT: Yes, as to what happened and the sequence
22 of events and why it happened.

23 Q BY MR. FLYNN: In fact, with regard to the
24 notation that Mr. Hubbard thought his materials had been
25 stolen prior to 1953, do you have any knowledge whether he
26 had communicated that to Omar Garrison which was attached to
27 the subsequent contract that was entered between PDK and
28 Mr. Garrison and Mr. Armstrong?

41-2

1 A Yes, he did.

2 Q Now, were there to your knowledge routine
3 communications in 1980 while you were collecting documents
4 between Laurel Sullivan and Mary Sue Hubbard?

5 A Yes, on practically a daily basis.

6 Q And to your knowledge was Laurel Sullivan
7 personally very close to Mary Sue Hubbard?

8 A Yes, she was.

9 Q And it was Laurel Sullivan that asked you to
10 write a complete briefing to Mary Sue Hubbard of everything
11 that you were doing; is that correct?

12 A Yes.

13 Q And again at that time did you need Mary Sue
14 Hubbard's approval to collect documents from around the world
15 for this project?

16 A No.

17 Q You did it because Laurel Sullivan asked you to?

18 A Yes.

19 Q Now did you tell Mrs. Hubbard that in January
20 there had been a raid threat at the Special Unit which resulted
21 in your collection of the initial set of materials?

22 MR. LITT: Objection. Mr. Flynn is simply reading from
23 the document. The document speaks for itself.

24 THE COURT: It is true. It is not in evidence yet.

25 MR. FLYNN: Well, I'd move it into evidence at this
26 time.

27 THE COURT: Any objection?

28 MR. LITT: Well, yes.

41-3
1 I mean, what is the purpose for which it is
2 introduced, Your Honor?

3 THE COURT: I suppose it is a communication from this
4 witness inferentially to C of 10-15-80.

5 MR. HARRIS: Given the witness' testimony, we have
6 no objection to that going in.

7 THE COURT: All right, it will be received. J is in
8 evidence.

9 Q BY MR. FLYNN: And did you make an effort to
10 list some of the materials you had collected to that point
11 in time?

12 A Yes.

13 Q Now at this point in time in October of 1980
14 what is your estimate, Mr. Armstrong, as to the quantity of
15 materials that you had collected for the biography of
16 L. Ron Hubbard?

17 A Probably a couple of hundred thousand pages.

18 Q And you told her, did you not, that the list
19 goes on and on; do you recall saying that?

20 A Yes. I don't know quite what the list was I
21 was referring to, but -- at this point. I do recall that
22 statement in the document, though.

23 Q When you left your position collecting documents
24 for the biography of Mr. Hubbard, approximately how many
25 documents had you collected to that point in time?

26 A Maybe five or six hundred thousand.

27 Q And of the documents under seal what is your
28 estimate as to approximately what percentage of the documents

1 under seal has in relationship to the overall number of
2 documents that you collected?

3 A Maybe one or two percent.

4 Q Now did you tell Mrs. Hubbard that many
5 documents were being lost and destroyed because of their lack
6 of being attended to and collected and you had discovered
7 that fact?

8 MR. HARRIS: Insofar as the question as phrased,
9 "Did you tell Mrs. Hubbard" --

10 MR. FLYNN: I will withdraw it, Your Honor.

11 Q Did you become concerned, Mr. Armstrong, that
12 in the collection process you were finding that many documents
13 were kept in damp, mildewed, unheated areas and were subject
14 to being lost or destroyed?

15 A Yes.

16 Q And did you find that to be the case?

17 A Yes.

18 Q And where did you find that to be the case?

19 A That was in the case in GOPR Archives WW.

20 Q And did you go to GOPR Archives WW?

21 A Yes.

22 Q And that is Guardian's Office Public Relations
23 Archives at Worldwide?

24 A Yes.

25 Q And that was in England?

26 A Yes.

27 Q And when did you go there?

28 A In about September of 1980.

1 Q And would you describe how large of a building
2 these archives comprised in September 1980?

3 A It is not a particularly large building. The
4 PR Archives which you saw would have amounted to several
5 hundred thousand pages.

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1 Q Were they all housed in one building?

2 A What I saw of them were all in one building,
3 yes.

4 Q Now, is there anything of particular
5 significance in your communication to Mrs. Hubbard of
6 October 15, 1980?

7 MR. HARRIS: Can we refer to the exhibit as opposed to
8 Mr. Hubbard? It is addressed to Mrs. Hubbard, but that was
9 specific testimony that she didn't receive it, Your Honor.

10 Q BY MR. FLYNN: Referring to exhibit J --

11 A I'm really not sure what "your communication"
12 means.

13 Q BY MR. FLYNN: It was your purpose, was it not,
14 to keep her fully abreast of what you were doing?

15 A Yes. That is correct.

16 MR. LITT: Objection. Leading, Your Honor.

17 THE COURT: Why did you head this off with "Dear
18 Sir:"?

19 THE WITNESS: Your Honor, in the SEA Organization
20 L. Ron Hubbard is the Commodore and she is the Deputy
21 Commodore. And it is a -- in retrospect, I must admit it is
22 a para-military organization which contains --

23 MR. LITT: We'll move to strike, Your Honor.

24 THE COURT: I think he is trying to explain. I'll
25 permit him to explain.

26 I have already drawn the conclusion that it is
27 sort of Navy-oriented. I was in the Navy myself at one
28 time.

1 Go ahead.

2 THE WITNESS: everyone in the SEA Organization has a
3 rank of some kind.

4 I rose to the rank of Ensign.

5 And depending on the situation, senior officers
6 were called "Sir."

7 Mary Sue was a senior officer. And within the
8 SEA Organization, as opposed to within the Guardian's
9 Office, for example -- well, Guardian's Office personnel did
10 not go by the SEA Organization military designations. They
11 went -- they would refer to her as Mary Sue.

12 THE COURT: All right. You may continue, counsel. I
13 didn't mean to interrupt.

14 Q BY MR. FLYNN: Was it common for you to use the
15 term "Dear Sir" in addressing Mary Sue Hubbard in her
16 position as controller?

17 A Yes.

18 Q Was that commonly done by other people in your
19 observation?

20 A Yes.

21 Q Did you receive a response from Mary Sue Hubbard
22 to exhibit J?

23 A Yes.

24 Q And what was the response?

25 A I don't recall in detail, but I definitely got
26 an acknowledgement from her of receipt of this letter.

27 Q And when did you last see that?

28 A In the organization, sometime before I left.

1 Q Do you know whether Laurel Sullivan received
2 that response?

3 A I don't recall if we discussed it or -- but we
4 probably would have.

5 MR. FLYNN: Your Honor, if that is available, may that
6 be produced together with the COLED and the response, if
7 any, of Mary Sue Hubbard to the COLED?

8 THE COURT: Well, were these noticed to produce, any
9 of these documents at any time?

10 MR. FLYNN: They were, Your Honor.

11 MR. LITT: They were? Can you provide that?

12 MS. DRAGOJEVIC: I believe we received the COLED at
13 one time, Your Honor. We simply can't locate it in our
14 office at this time. We did receive it from the church. We
15 have been looking for it and can't find it in the office.

16 The other items, I believe, were requested. We
17 don't have our request for production in the court, but I
18 would be willing to go back and look.

19 THE COURT: Well, the only thing that I'm concerned
20 about, I gather there are thousands and thousands of places
21 to look. And I would think that if we can identify where
22 these are likely to be if they are in existence, maybe that
23 would be of assistance here and it wouldn't involve somebody
24 with an order that would require an exercise of thousands of
25 hours of effort here.

26 I don't propose to do that.

27 MR. FLYNN: Well, --

28 Q Do you know where they were left, Mr. Armstrong?

1 A Yes. All of that type of communications was in
2 one file cabinet in which were also contained the
3 communications with Omar Garrison relative to the biography
4 and any communications from Mary Sue Hubbard including
5 communications from Omar Garrison and Mary Sue Hubbard and
6 the various copies of my non-existence formulas and any
7 other documents relating to the biography or archives or
8 museum project were all in one file cabinet.

9 Q Where was that file cabinet when you last saw
10 it?

11 A It was alongside of a wall where there was a
12 bank of file cabinets inside the archives room.

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1 Q And were there file folders with headings on
2 them that related to these or that may have contained these
3 particular items; namely, the COLED, the response of Mary Sue
4 Hubbard to the COLED and the response of Mary Sue Hubbard to
5 exhibit J?

6 A They would have all been in a file called
7 "Biography Project." There was a few files which were
8 biography project files which were not archives exactly,
9 but related correspondence and documents relating to
10 archives and to the biography project.

11 THE COURT: Well, I will make an order, Counsel, that
12 personnel make reasonable effort to try to locate those
13 documents and report back.

14 MR. HARRIS: The COLED I am given to understand, Your
15 Honor, has a number on it.

16 Maybe with this witness familiarity he could
17 tell us what the number was or even the hundred or whatever
18 within a hundred of what it was.

19 THE WITNESS: I think if you were to just check the
20 COLEDS which were issued in 1980, that would narrow it down
21 within a hundred.

22 MR. HARRIS: And the next is the alleged approval or
23 acknowledgement of the exhibit J; is it?

24 THE COURT: Yes, by Mary Sue Hubbard.

25 MR. HARRIS: I have looked, Your Honor, and on that
26 I know there is no such thing, and I have looked in the files.
27 But I will check with personnel.

28 THE COURT: All right, see what they can find.

1 MR. FLYNN: Your Honor, I believe the church or the
2 intervenor did introduce what has been marked as exhibit J,
3 so they might look in the same file where exhibit J was filed.

4 MR. LITT: That has already been looked at, Your Honor,
5 but we will see if it is anyplace else.

6 THE COURT: All right.

7 Q BY MR. FLYNN: Now, from your nonexistence
8 formulas, Mr. Armstrong, I understand that you were creating
9 the LRH biographical archives; is that correct?

10 A Yes.

11 Q And did you prepare an outline of where you
12 were collecting documents from for the biography project?

13 A Yes.

14 MR. FLYNN: And may that be marked as the next
15 exhibit in order, Your Honor?

16 THE COURT: Double C, I believe.

17 Q MR. FLYNN: Now, would you explain, Mr. Armstrong,
18 exhibit double C to the court.

19 A This shows the sources of at least the greatest
20 percentage of the materials which were provided to me or made
21 their way into the space which was designated LRH Biographical
22 Archives, and also some of the materials which during that
23 time were provided or went to Controller Archives.

24 Q Now in some instances, for example, you have
25 got an arrow from GOWW Archives directly to Controller Archives,
26 but not over to LRH Biographical Archives; what does that
27 mean, Mr. Armstrong?

28 A Well, GOWW Archives actually was the source

1 of what became the bulk, at least of the Controller Archives.

2 Q And did you receive directly any documents
3 from GOWW Archives without going through Controller Archives?

4 A No.

5 Q What persons did you deal with to get documents
6 from GOWW Archives?

7 A Well, there were -- I guess I dealt with
8 Tom Vorm. Ultimately it came from his -- his Controller
9 Archives came from there.

10 Q And did you have an understanding when you
11 received those documents from Controller Archives where they
12 had come from?

13 A Only through conversations with Tom Vorm and
14 the fact that I knew of the trunks from when I was on the ship,
15 and I knew roughly at that time the history of the trunks.

1 Q What did you know about the history of the
2 trunks?

3 A About their being brought to the ship by Wally
4 Burgess.

5 Q What knowledge did you have when you were
6 collecting these documents of how GO-WW archives worked?

7 A I don't believe I had much knowledge of that at
8 all.

9 Q Well, you had been there; is that correct?

10 A We are not talking about GO-PR archives.

11 I never obtained any material during that time
12 from GO-PR archives. They sat during that time in the UK,
13 to the best of my knowledge.

14 GO-WW, something else; they housed at a certain
15 period what became controller archives and they were shipped
16 over.

17 Q Do you know where GO-WW archives were kept in
18 the United Kingdom in England?

19 MR. LITT: What time frame are we talking about?

20 Q BY MR. FLYNN: Did you learn while you were
21 collecting documents where GO-WW archives had been kept
22 prior to the creation of controller archives?

23 A In Saint Hill Manor, the exactly location, I
24 don't know.

25 Q What is your understanding as to when controller
26 archives was created?

27 A It would be in the late '70s.
28

1 Q And the LRH Biographical archives was created
2 with your position; is that correct?

3 A That is correct.

4 Q Did you understand or have any understanding
5 that GO-WW archives contained master copies or a master
6 inventory of everything in controller archives?

7 A I wasn't sure if they contained everything. But
8 it seemed likely, having seen GO-WW, that they contained at
9 least the bulk of them.

10 Q Was that your understanding from Mr. Vorm?

11 A Mr. Vorm and I never discussed that.

12 Q How did you arrive at that understanding?

13 MR. LITT: Can we have the understanding clarified,
14 Your Honor?

15 THE COURT: I think it was an assumption or inference
16 that he drew rather than -- he made a comment, "It seemed
17 likely." And I don't --

18 THE WITNESS: I don't have any first-hand knowledge to
19 be able to answer your question on that.

20 Q BY MR. FLYNN: Well, when you were collecting
21 documents from Mr. Vorm, was that your understanding?

22 MR. LITT: Was what his understanding?

23 MR. FLYNN: That the GO-WW archives were the master
24 archives for the controller archives from which the
25 controller archives were coming.

26 THE WITNESS: I understood that all the controller
27 archives came from there. I don't know that it was master
28 archives.

1 Q BY MR. FLYNN: Okay. Now, in the creation of
2 the controller archives, there were two other arrows from
3 "PERS COM FLAG N Purchased Items"; what does that mean?

4 A During the course of my work collecting up the
5 biographical archives, I had the files which were designated
6 "PERS COM FLAG files" sent to Los Angeles from Clearwater.

7 Those files covered principally the period of
8 time on board -- while Mr. Hubbard was on board the ship and
9 shortly thereafter in Clearwater and Dunedin.

10 These things were kept off the property in
11 Clearwater in a closet in Clearwater, one of the berthing
12 buildings for the base.

13 I found that in a trip I did to Clearwater in
14 May of 1980 and I made arrangements for these things to be
15 sent to me.

16 When they arrived -- and there was a great
17 number of them, about 30 or 40 boxes -- within the boxes
18 themselves were a number of what we call technical or policy
19 materials. And those were delivered directly to Mr. Vorm.

20 The materials which were not technical and were
21 not originals or carbon copies of policies which Mr. Hubbard
22 had written, I took into my archives, biographical archives
23 area.

24 They could have been to do with any number of
25 subjects. But the technical materials, Mr. Vorm, went to
26 the PERS COM boxes and took out the technical materials
27 himself. And I went through some and delivered them
28 directly to Mr. Vorm.

1 The purchased items, the reason that the arrow
2 is there is because during the course of my traveling around
3 the country, I would on occasion come across materials which
4 I purchase. And if on -- a lot of times, it was materials
5 that I did not have any interest in, but which I felt
6 Mr. Vorm, in his capacity or the organization may have some
7 interest in.

8 They were not biographical. They were technical
9 materials. So that kind of stuff, I would make arrangements
10 and purchase.

11 For example, there was a number of tapes.
12 Mr. Vorm had the tape archives of all of the tape masters of
13 lectures done by Mr. Hubbard. It was not complete. And
14 Mr. Vorm and others were attempting to obtain the complete
15 list of the complete tape library.

16 So when I located people from the early days of
17 Dianetics or Scientology who had tapes, I compared them with
18 a master list which Mr. Vorm had to see whether or not
19 included in the tapes which the people had were ones which
20 Mr. Vorm did not have.

21 And on those occasions, I purchased the tapes
22 and brought them back to Mr. Vorm. So tapes and on another
23 couple of occasions, I purchased technical originals or
24 original technical writings by Mr. Hubbard which Mr. Vorm
25 did not have. And I brought those back.

26 These were not things which I was going to be
27 needing because Mr. Garrison was not going to -- this was
28 not going to be a book about Dianetics and Scientology; it

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was going to be strictly biographical.

So I made the decision and sent those things
directly to Mr. Vorm.

5-1
1 Q So, is it basically fair to say that the
2 technical items went into the controller archives and personal
3 items relating to L. Ron Hubbard went into the LRH biographical
4 archives?

5 A Yes.

6 Q And was this the understanding of everyone
7 throughout the period of time that you worked on this project
8 that you dealt with?

9 A Yes.

10 MR. HARRIS: To the extent the witness can generalize
11 about the understanding of everyone, Your Honor.

12 THE COURT: Well it was rather conclusionary,
13 but I will let it stand.

14 Q BY MR. FLYNN: Is there anyone that you dealt
15 with in any Scientology organization throughout the period of
16 time that you worked on the biography project, Mr. Armstrong,
17 who refused to give you materials because they were personal
18 records of L. Ron Hubbard?

19 A No.

20 Q And, in fact, you had the letter from Miss Brice;
21 is that correct?

22 A Yes.

23 Q Now, there is a notation "Del Sol storage."
24 Approximately what quantity of materials came from Del Sol
25 storage that went into the biographical archives?

26 A There were 21 or 22 boxes all together,
27 different sizes and different shapes, and I think that the
28 total must have been a hundred to two hundred thousand pages.

1 Q And that was acquired by you right at the
2 beginning of the collection process; is that correct?

3 A Yes.

4 Q And did Laurel Sullivan know that you had
5 acquired those boxes right at the beginning of the collection
6 process?

7 A Yes.

8 Q And how long thereafter did you continue to
9 collect documents relating to the biographical archives?

10 A Right up to at least the point I left the
11 organization.

12 Q Which was when?

13 A December 12, 1981.

14 Q Now during that period of time did anyone
15 ever tell you to remove the Del Sol storage boxes from the
16 biographical archives?

17 A No.

18 Q Now you have an arrow from the Pers Sec Flag
19 files.

20 Approximately what quantity of materials did
21 you receive from that source for the biographical archives?

22 A I would say another hundred or one hundred fifty
23 thousand pages.

24 Q What in general types of documents were involved
25 in the Pers Sec Flag files?

26 A There was a great deal of correspondence between
27 Mr. Hubbard and friends, family, wives, father, mother, son.
28 A lot of correspondence in those files.

1 Q Who had possession; what person did you deal
2 with to get possession of those materials that you just
3 described?

4 A Pat Brice.

5 Q And she authorized you to have those materials?

6 A Yes.

7 Q And she was L. Ron Hubbard's personal secretary?

8 A Yes.

9 Q And what in general was the nature of the
10 documents that came from Del Sol storage?

11 A They were documents with -- they were early
12 documents. The majority of them predated Dianetics, so they
13 were pre-1950 documents. There were some documents included
14 in there which went into the '50's, probably up to the mid-
15 '50's.

16 Q You had mentioned the documents pertaining to
17 Quentin Hubbard as coming from Del Sol storage; do you recall
18 that?

19 A Yes.

20 Q Now do you know how those materials got into
21 Del Sol storage?

22 A No.

23 Q Did you ever give materials relating to the
24 death of Quentin Hubbard to Omar Garrison?

25 A Yes.

26 Q What did you give to him?

27 A There was a bunch of materials which was provided
28 by the Intelligence Bureau to Vaughn Young who was then working

1 with me on the biography project, and Vaughn had access to
2 the Guardian's Office and obtained these things for me to
3 deliver to Omar.

4 Q Where did Vaughn Young obtain them from?

5 A From B-1, Bureau 1 of the GOUS.

6 Q Who is Vaughn Young?

7 A Vaughn Young was at that time a member of the
8 US Guardian's office in the public relations bureau.

9 Q And who was his supervisor?

10 A At that time I don't know.

11 Q Mary Sue Hubbard was the controller over
12 the Guardian's office; is that correct?

13 A Yes.

14 MR. LITT: What period of time are we talking about?

15 THE COURT: Well, what period of time do you have
16 reference to?

17 THE WITNESS: This was in late 19- -- in the fall of
18 1980.

19 Q BY MR. FLYNN: Now, do you know how these materials
20 got into the Del Sol storage?

21 A No.

46-1

1 Q Do you know where Vaughn Young got his author-
2 ization to get materials from the B-I files relating to the
3 death of Quentin Hubbard?

4 A No.

5 He did tell me that he got them from B-1.
6 Who there, I'm not sure who made them available.

7 Q What quantity of materials did he get from the
8 Pers Sec WW files?

9 A There was a very large box and a couple of
10 smaller boxes. So I would say maybe 15,000 pages, maybe
11 less.

12 Q What in general was the nature of those
13 materials?

14 A They were Mr. Hubbard's files which had been
15 maintained in the Pers Sec WW area which is inside the
16 Saint Hill manor. They principally dealt with ships, with
17 Hubbard's explorational company, with OTS, with Horticulture,
18 activities in which Mr. Hubbard was involved at Saint Hill in
19 the '60's.

20 Q What is OTS?

21 A Operation and Transport Services.

22 Q And was that a corporation which was the
23 predecessor to OTC?

24 A Yes.

25 Q So the documents relating to the Hubbard
26 explorational company came from the Pers Sec WW files; is that
27 correct?

28 A Not all of them.

46-2
1 MR. HARRIS: Objection. Ambiguous, Your Honor.

2 The files, there has been already testimony
3 from Mr. Vorn and is on an inventory list of a mass of HEC
4 documents.

5 THE COURT: You can reframe the question.

6 Q BY MR. FLYNN: Where did HEC materials come
7 from, Mr. Armstrong?

8 A They came from either the controller's archives
9 or from the Pers Sec WW files.

10 There was also some in Pers Sec files.

11 Q What is the difference between Pers Sec files
12 and Pers Sec WW files?

13 A Pers Sec Flag.

14 Q There were HEC materials there also.

15 A yes.

16 Q Do you know of any other place where there were
17 Hubbard explorational company files?

18 A I can't say for certain, there is something in
19 my mind when I went through the GO PR Archives at WW in
20 finding files on that subject there.

21 Q But in any event, you are certain HEC Hubbard
22 explorational materials came not only from controller archives
23 but from these other sources too; is that correct?

24 A Yes.

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47.1
1 Q And approximately what quantity of materials
2 came from Pers Com Flag for the biographical archives?

3 A That was again probably a couple hundred
4 thousand pages.

5 Q And what in general was the nature of those
6 materials?

7 A Those were principally from the period when
8 Mr. Hubbard was on the ship, and some subsequent from Dunedin,
9 and that was principally it.

10 Q And approximately what quantity of materials
11 came from purchased items for the archives?

12 A Very, very small amount, maybe 300 pages.

13 Q And what was the nature of those items?

14 A There were two main sets which come to mind.
15 The first was from Barbara Snader, who was a girlfriend of
16 Mr. Hubbard's in the early '50s, and the other set was from
17 a woman by the name of Helen O'Brien, who was the head of
18 Dianetics-Scientology in the U.S. in the early 1950's, 1952.

19 Q And the last category, B-1 files, what
20 quantity of materials came from B-1 files that went into the
21 biographical archives?

22 A I would say there was maybe a thousand pages.

23 Q And what in general was the nature of those
24 materials?

25 A Those referred to Quentin Hubbard, Mr. Hubbard's
26 naval records obtained under the Freedom of Information Act.
27 Maybe there would be 2,000 pages total, and the pack of
28 materials entitled "Estimate and Reader's Digest."

47.2
1 Q Did Vaughn Young give you those?

2 A Yes.

3 Q And do you know whose authority he did it with?

4 A No.

5 Q So there were naval records in the Del Sol
6 storage and naval records in the B-1 files; is that correct?

7 A Yes, at least.

8 There were also some naval records in Pers Sec
9 Flag files, but the two most extensive sources were the
10 Del Sol storage and the B-1 files.

11 Q And there were Quentin Hubbard documents in the
12 B-1 files and in the Del storage; is that correct?

13 A Yes. However, the Quentin Hubbard files in
14 Del Sol storage, I believe, were sent off the property in
15 the beginning of 1980.

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1 I went to Laurel and mentioned that they were
2 there. And it was considered at that time that it would be
3 safer to move them off the property. Where they went at
4 that point I am not sure.

5 Q Who made the decision to move them?

6 A Laurel.

7 This is what I got from her. I dropped the
8 subject at that point.

9 Q And did the subject come up at a later point in
10 time?

11 A I don't believe I have ever discussed it with
12 her.

13 MR. FLYNN: Perhaps this would be a good time to
14 break, Your Honor.

15 THE COURT: We'll accept that.

16 We'll recess until 9:00 o'clock tomorrow
17 morning.

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19 (At 4:00 p.m. an adjournment was taken
20 until Friday, May 11, 1984 at 9:00 a.m.)
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